

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 WEST PALM BEACH DIVISION

4 CASE NO. 20-md-02924-ROSENBERG

5 **IN RE: ZANTAC (RANITIDINE)** .
6 **PRODUCTS LIABILITY** . West Palm Beach, FL
7 **LITIGATION.** . May 13, 2020
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9 .

10 VIDEO CONFERENCING of
11 DISCOVERY CONFERENCE

12 BEFORE THE HONORABLE ROBIN L. ROSENBERG
13 UNITED STATES DISTRICT JUDGE and
14 THE HONORABLE BRUCE REINHART
15 UNITED STATES MAGISTRATE JUDGE

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1 THE COURT: Okay, good morning, everyone. Welcome
2 back for day two.

3 Today we are talking about discovery, an equally
4 exciting day as yesterday, I am sure.

5 More specifically, Pretrial Order 16 says that the
6 purpose of today's hearing is to permit the Court, including
7 the Magistrate Judge, to listen to more fulsome presentations
8 from counsel on their visions for discovery, including more
9 formal questions from the Court about the parties' expectations
10 for the discovery process.

11 This will also be the time in which the Court will
12 take up any specific discovery matters that need to be
13 addressed, if warranted. That came from PTO 16.

14 I am not aware of any specific discovery matters that
15 necessarily need to be addressed today from the Court's
16 standpoint, and I think that is probably because, as I said
17 yesterday and will reiterate again today, the parties have done
18 such a terrific job of working together, of keeping the Court
19 apprised. We got a little preview yesterday on the case
20 management presentation, and so I am confident, as with
21 yesterday, that you will be presenting to us the lineup from
22 the Defense and the Plaintiff today, how you have worked out
23 initial productions among the brands, the generics, the
24 retailers, status of your proposed orders.

25 I am anxious to hear about anticipated motions, and I

1 know everybody is looking forward to the report on initial
2 census since it has been such a significant and important tool
3 that the parties have participated in in this case.

4 I just, again, want to tell you how much I appreciate
5 how well everyone is working together and how collaboratively
6 you have been working. I am of the firm belief that if the
7 parties can work issues out, that they should be given the
8 opportunity to do so. It is your litigation after all. You
9 know the issues better than we do, quite frankly, at this point
10 and it is our job to become educated and to be a resource for
11 you for guidance when you need it, and of course to resolve
12 disputes when you can't work out any issue, and we fully
13 recognize that that is bound to happen at some point in this
14 litigation.

15 As you can see, Judge Reinhart is here with me, we are
16 conducting the hearing jointly. We are on different Zoom
17 screens, we are not sitting next to each other so that we can
18 honor the 6-foot social distancing rule. He is in a different
19 part of the courtroom, but we are both here.

20 And I wanted to let you know, as I asked you
21 yesterday, for the benefit of our court reporter who is taking
22 everything down and who has just been tremendous in working
23 with this new technology that really has not been something
24 that has been familiar to her over her many, many years of
25 court reporting, she has just been terrific, and so, she would

1 like to make sure that everyone introduces themselves before
2 they speak so that she can be getting your name down and that
3 the brilliant comments that come from your mouth are, in fact,
4 associated with you. I am sure you want that as well and you
5 all want an impeccable transcript as Mrs. Stipes takes great
6 pride in producing.

7 So, please do remember that.

8 At this point, what I would like to do is turn it over
9 to Judge Reinhart for some opening remarks as well before we
10 then get into the substance of the agenda.

11 *MAGISTRATE JUDGE REINHART:* Thank you, Judge
12 Rosenberg.

13 Today I look really forward to hearing the parties'
14 ideas about the best way to manage the discovery in this MDL.
15 When I think about it, there are really two components to
16 discovery in a case like this, there is structural and
17 substantive components. Mr. Gilbert talked yesterday about
18 some of the structural orders that need to be put in place
19 here, preservation of evidence, privilege issues,
20 confidentiality, and ESI. I think those are all crucial to
21 what we are trying to accomplish here.

22 I was also sent a draft of a proposed order on
23 discovery disputes which I thought was particularly well done
24 because you more or less cut and pasted my order. So kudos to
25 you. If you think other structural orders are needed in this

1 case, please work them up and submit them to us. I consider
2 those sorts of orders like fire insurance, it is always better
3 to have them and not need them than to need them and not have
4 them. Any order of that nature that you think we need, please
5 let me know.

6 In terms of substantive discovery, as the parties
7 know, Rule 26(b) permits discovery of evidence that is relevant
8 to the claims and defenses in the litigation, and which is
9 proportional to the needs of the case. For me, yesterday was
10 particularly valuable because it was educational for me and for
11 Judge Rosenberg on what the likely claims and defenses are
12 going to be. That provides the framework against which we will
13 evaluate discovery in this case and it certainly provides an
14 important framework for us to hear today's discussion and to
15 participate in today's hearing.

16 Now, the Rules of Civil Procedure encourage active,
17 and sometimes proactive, involvement by judges in the discovery
18 process, and when necessary, I am happy to play that role. I
19 am pleased here, however, that that hasn't been necessary for
20 the reasons Judge Rosenberg already mentioned, the parties have
21 done such a fine job of working together and collaborating and
22 cooperating. All things considered, like Judge Rosenberg, I
23 would prefer to let you run your own case and not micromanage
24 you. And so, as long as you continue to play nicely and
25 continue to cooperate, and you don't need me, I will not be

1 reaching out to bother you, but certainly once you need me, and
2 if you need me, I am here and I will be available to you and
3 resolve your disputes as quickly as I can.

4 One other thing I did want to mention, and I was very
5 pleased to see this in one of the proposed orders on discovery
6 procedures, and that was the inclusion of what I call a NextGen
7 provision which I have in my standing order.

8 For those of you on the call who are not familiar with
9 that kind of provision, it allows for a less experienced lawyer
10 to come to court and to argue discovery matters. I know my
11 general rule is that only one lawyer gets to argue each issue;
12 however, if you notify me that you are going to let a less
13 experienced lawyer, which I generally define as seven years or
14 less experience, but I am open to be persuaded some with a
15 little bit more experience than that, but if you let a less
16 experienced lawyer to argue the motion, I will allow the more
17 experienced lawyer to come in after the fact and they can
18 adopt, disavow, amend, supplement anything that the younger
19 lawyer said.

20 So, it is structured to make sure that no one is
21 prejudiced by allowing a lesser experienced lawyer to get
22 involved in the litigation process. I am very sensitive that
23 you all have clients and clients sometimes don't want less
24 experienced lawyers to argue because they are afraid they might
25 lose the hearing because the less experienced lawyer handles

1 it, and I can assure you this is all set up in a way to prevent
2 that from happening.

3 Candidly, I have been doing it for two years, and more
4 often than not the less experienced lawyer does just fine and
5 the senior lawyer has nothing else to say.

6 With that, I want to thank you all in advance for
7 today, I want to tell you that I look forward to working with
8 each of you and getting to know you over the next 18 months or
9 so as we share this journey together.

10 Thank you, Judge Rosenberg, I will turn it back over
11 to you.

12 *THE COURT:* Thank you, Judge Reinhart. With that, we
13 will turn it over to the general discovery update, the
14 presenters for that part of the session. Good morning.

15 *MR. McGLAMRY:* Your Honors, this is Mike McGlamry on
16 behalf of Plaintiffs. It's good to see you all this morning.

17 Judge Rosenberg, I am glad you started with the
18 thought that maybe today we are not doing presentations
19 because, for the most part, what we intend to do today is
20 report what we have been doing concerning discovery and the
21 orders and that sort of thing.

22 Before I start, though, I wanted to add my thanks and
23 acknowledgment of Special Master Dodge because until now, I
24 have not really had the opportunity to do that. I kind of
25 chuckle myself when I hear her referred to as Special Master

1 Dodge, kind of sounds to me like the Sheriff of Dodge City.

2 In the mass tort world all the stakeholders have great
3 interest in how this goes, the Plaintiffs Bar, the Defense Bar,
4 the Courts, obviously, the rules committees, the academics,
5 and, of course, our clients, both on the Plaintiffs side and on
6 the Defense side are concerned with that, and we all want the
7 process to be fair and reasonable and practical, efficient and
8 effective, and all of those things. And there are a lot of
9 moving parts, there is a lot of competing and conflicting
10 interests, but ultimately, I think everybody wants to make sure
11 that it makes sense and that we do it the right way.

12 No one, in my opinion, exemplifies that aspiration
13 better than Special Master Dodge. I know she has devoted a
14 considerable amount of her career towards making this process
15 better, and in this litigation, I know specifically and
16 personally that her tireless and timeless and focused efforts
17 have really, really helped us move this thing along.

18 I said in my interview last week that I thought in the
19 couple of months that we have worked together we accomplished
20 what typically takes six to nine months to happen in an MDL. I
21 may modify that now to say nine to 12 months, maybe even more,
22 but it is that significant, and we look forward to working with
23 her and relying on her as we go forward.

24 With regard to discovery, I sort of want to give an
25 opening comment about what we have been doing and how we hope

1 to go forward with this, sort of in line with what both you,
2 Judge Rosenberg, had mentioned, and Judge Reinhart particularly
3 with your concepts of structure and substantive discovery.

4 But largely because of your Honor and the facilitation
5 of Special Master Dodge we have moved expeditiously and
6 collaboratively with the Defendants. PTO 16 required us to
7 meet and confer about initial Defendant production as well as
8 orders that refer to the process. Special Master Dodge had us
9 up early in the mornings and up late at night, including last
10 night, and we have been meeting and conferring.

11 We started as a larger group, for example, several
12 lawyers on our side and a group of lawyers on behalf of all of
13 the four brand manufacturers, to sort of exchange concepts and
14 preferences and options as we move forward just generally
15 speaking with discovery.

16 We then broke out with the separate brand
17 manufacturers to discuss each of their sort of particular
18 situations, as well as the retailers, and we are doing that
19 now, your Honors, with the generics and obviously you will hear
20 about all of that as we go forward this morning.

21 We provided the four brand manufacturers a list of
22 initial production requests. We talked about them. They got
23 together on their side and came back to us and responded
24 essentially with an outline of what they could collectively do
25 to respond.

1 It was a very good outline, although it was generic in
2 one sense, no pun intended, because we would then have to break
3 out with each of the Defendants to talk with them about their
4 specific situations, and we did that. We broke out and had a
5 couple of lawyers assigned on our side along with a couple of
6 lawyers for each of the brand manufacturers to discuss their
7 particular circumstances, and kudos to the Defendants as they
8 stepped up and were helpful in these discussions concerning
9 specific issues like timing, the format of documents.

10 We go back a long time in history here, and so we are
11 actually talking about paper, which is something that I
12 actually remember more so than most of the younger lawyers
13 involved in this, as well as the formatting and access,
14 particularly in light of COVID-19 and warehouses being shut
15 down and so forth and so on.

16 You will hear more about that next.

17 Additionally, we exchanged proposed orders. We
18 followed up with Zoom calls for each of the orders. One
19 example with regard to the ESI protocol, we had several Zoom
20 calls where there were about 17 lawyers on the call. It
21 reminded me of an episode of Hollywood Squares, there were so
22 many people there to kind of look at and talk to at the same
23 time.

24 We then exchanged drafts, we exchanged letters and
25 emails back and forth sort of outlining our issues, and we had

1 more of the meet and confers. And then we have, as you know,
2 agreed on the discovery dispute resolution protocol, and again
3 I give kudos to Elaine Horn. We are getting close on the
4 others. Hopefully Joe will agree to what I have discussed here
5 as being reasonable and practical, because he has been that way
6 throughout this. And I have to keep telling myself that he is
7 one of the best defense lawyers in the country, and at heart he
8 does not have my best interests in mind, but he has been
9 working well with us, and we really do that.

10 Judge Reinhart specifically, as much as we have
11 accomplished thus far, we all realize that pretty soon we are
12 likely to be calling upon you in helping us along. We know you
13 will play a critical role in this. It is a large MDL with a
14 lot of moving parts and a lot of different Defendants and a lot
15 of third parties, and so there will be a lot of discovery. We
16 can't imagine that we won't be going forward with your help in
17 mind.

18 Obviously it is too early at the moment for a
19 discovery dispute, but you sort of stole our thunder, we were
20 going to give you kudos about the standing order because we
21 did -- we took your standing order and we tried to essentially
22 adapt it to the MDL context. One of those provisions that you
23 mentioned, the NextGen piece, I know that both the Plaintiffs
24 and the Defendants were glad to see that and glad that we can
25 utilize that as sort of an extension of where Judge Rosenberg

1 started us all off on the diversity track, and it is a good
2 thing. We really are all excited about having and being able
3 to engage with younger lawyers.

4 I will just say on our side, since the leadership
5 order came out and we have had some limited access to our newer
6 partners in this, that younger and less experienced crowd
7 really does bring a great energy and so I know that will be
8 helpful in this discovery process.

9 Partly the reason, your Honor, that we adopted your
10 standing order is that it allows for us to quickly get to you,
11 raise our issues in an effective and efficient way, get those
12 things resolved if we can't do them, obviously, as you
13 indicated, in advance by ourselves and be able to move on.

14 As we came to the Court yesterday with essentially our
15 schedule that we have sort of in concept agreed to, being able
16 to move this quickly along is a huge piece, to be able to
17 accomplish all this in the time that we have discussed.

18 And also, at least in my opinion, it affords the
19 parties a motivation to get this done without having to come to
20 the Court because we know, boom, right away we are going to be
21 there. So we are better off, if we can, to try to resolve it
22 ourselves, so we did think that it was really good to have --
23 to be able to sort of plagiarize your order in this context.

24 The other thing that we talked about on our side, and
25 I hope that Joe and the Defendants can agree to this as we talk

1 later about the orders, we talked yesterday in the case
2 management section about the fact that we have some fundamental
3 foundational orders that we need to get in place to initiate
4 discovery, the ESI, confidentiality, preservation, and
5 privilege orders, and that we are working on those and I hope
6 we get those finished.

7 We have given ourselves a June 1st deadline that if we
8 can't resolve them, the Court, as we have asked -- and I think
9 the Court has indicated we could have a conference in mid June,
10 but what we would like to offer is that if we can't get a
11 resolution of all of them, or any of them, that we first
12 approach Judge Reinhart and have a conference with him in
13 advance of the case management conference to actually deal with
14 the orders so that we can provide to Judge Reinhart the issues
15 that are at play and the parties' respective positions so that
16 not only do we flush it out in front of him, but then he can
17 provide that information to you, Judge Rosenberg, so that you
18 are not coming into those decisions cold either, and we just
19 think that that is a way to sort of get this going.

20 We don't want Judge Reinhart to feel left out because
21 we have been able to accomplish a lot and we know, like I said,
22 that it is going to be on us really quickly.

23 That is essentially how we look at it. We look
24 forward to working with you, Judge Reinhart, and we are ready
25 to get this thing going, and I know Joe will have some

1 comments, too.

2 Thank you, your Honor.

3 *MR. PETROSINELLI:* Your Honors, good morning, Joe
4 Petrosinelli here for the Defendants. I represent Pfizer, but
5 speaking on this topic on behalf of the Defendants.

6 First, my friend, Mr. McGlamry, is dating himself with
7 the Hollywood Squares reference, I have to say that. I also
8 don't know why he thinks I don't have his best interests at
9 heart. Your Honors, I will tell you at every Zoom call we have
10 had I have given him some wardrobe suggestions and I see now he
11 has a very sharp tie on. It has been quite a pleasure to work
12 with him, and the rest of the Plaintiff leadership, as I said
13 yesterday.

14 On discovery in particular, I don't have too much to
15 add. Let me add just a couple of things maybe from the Defense
16 side perspective so, Judge Rosenberg and Judge Reinhardt, you
17 get a sense of how we are organized and how we have been
18 dealing with both of these issues, the orders and the
19 individual discussions.

20 On the order side, the counsel, four of us, Mr.
21 Cheffo, Mr. Bayman, Mr. Agneshwar, and I have designated folks
22 from our respective firms and teams to kind of form an orders
23 team, if you will, to deal with the Plaintiff lawyers on
24 specific orders and we have different teams on different
25 orders.

1 I echo for sure what Mr. McGlamry said about a younger
2 generation. We have some younger lawyers on those teams, and I
3 need hardly say that on orders such as ESI they are much better
4 equipped than maybe some senior lawyers to deal with those
5 issues. So, we have a robust diverse team on our side dealing
6 with those orders. As Mr. McGlamry said, I think there are
7 several outstanding, we are probably close to being done on
8 some, and maybe a little further away on others, but hopefully
9 by June 1st, we can get those done.

10 I will also say that on behalf of the interim leads,
11 we have, of course, shared those orders with the generics and
12 the retailers and gotten their input, which has been very
13 helpful, and incorporated suggestions that they have had so
14 that when we send things back to the Plaintiffs' teams it has
15 the input of all the Defense constituencies and certainly we
16 will continue to do that over the next couple of weeks.

17 On the individual side, a little bit different,
18 obviously. What we tried to do, as Mr. McGlamry said, is as
19 the interim leads for the Defense have an initial discussion
20 about issues that we thought would be crosscutting across all
21 Defendants sort of no matter what their situation was in terms
22 of general discovery issues or principles, as Mr. McGlamry
23 said, the Plaintiffs have provided us with sort of a one-page
24 document list and we worked from that and had some discussions
25 about general topics of agreement.

1 But then pretty quickly, I think by necessity, we sort
2 of have broken off individually because, as your Honors can
3 appreciate, every Defendant is situated differently with
4 respect to what documents they actually have in what format.

5 As Mr. McGlamry said, quite a few Defendants have
6 mostly paper documents. Where they are located, the burdens of
7 producing this or that are different for different Defendants.
8 And so, we have broken off into individual teams and those
9 teams, too, are made up of more senior lawyers and younger
10 lawyers, and you will get a report here momentarily on where
11 things stand on that with respect to the brands.

12 And then, as I mentioned yesterday in terms of the
13 generics and the retailers, that they will be handling their
14 own discussions about what they have and what they can produce.

15 So, it is quite an endeavor on the Defense side just
16 given all the orders and the different constituencies and the
17 different ways people are situated, but I think so far, as
18 reflected by the fact that we haven't had to come to the Court
19 with any disputes, I think it has worked quite well and hope it
20 will continue to be so.

21 I also echo Mr. McGlamry's comments on Judge Reinhart.
22 Your order is quite interesting to us, the form order that you
23 have for individual cases, and we found it -- you know, I think
24 we thought, well, maybe if there is a form order, it is not
25 going to work that well in an MDL. Actually, it is quite

1 detailed, much more so than a lot of standing orders of
2 magistrate judges around the country, at least in my
3 experience, and so we actually found it to be a useful starting
4 point.

5 Obviously, there are some things that are different
6 about an MDL that we tried to amend, but it was quite useful,
7 so we thank you for that, and hope the draft that we have
8 submitted to you meets with your approval, but we're happy to
9 answer any questions about that.

10 I'll just conclude by saying none of this would have
11 been possible without Special Master Dodge who has facilitated
12 these discussions with great skill and tenacity for sure. I,
13 too, was on the phone with her late last night, I don't know if
14 Mr. McGlamry was before or after me, but it has been a
15 pleasure. It is important, as where Mr. McGlamry started, an
16 MDL of this size and the publicity surrounding it, I think the
17 rules committee and other constituencies are looking at how it
18 is structured and organized and taking ideas from that, and I
19 think that is a great thing having been involved in some of
20 those discussions and conferences.

21 Thank you for allowing us this chance to -- Mr.
22 McGlamry and I thought it would be helpful to give an overall
23 preview before we got to specific Defendants. I am sure he and
24 I are happy to answer any questions you might have.

25 *THE COURT:* I very much appreciate the opening

1 remarks.

2 I can't say it enough, so I am just going to keep
3 saying it when I feel moved to say it, which is an expression
4 of gratitude and congratulations to the Plaintiffs and to the
5 Defense side for working so well together.

6 You know, particularly for our younger audience, but
7 sometimes even not for the young audience, but those who are
8 more senior, there seems often to be a perception that the only
9 way to represent a client vigorously is to kind of throw
10 roadblocks in the road and get before the Court often, and kind
11 of fight, fight, fight on every last point and, you know, that
12 has a lot of negative implications.

13 Number one, it is very time consuming and time
14 translates into money and costs. So, I appreciate the
15 Defendants are representing clients you are billing, and I am
16 sure that they are mindful of wanting effective leadership and
17 representation, but in a reasonable and as cost effective a way
18 as possible, having been on the defense side and having been a
19 general counsel myself.

20 From the Plaintiffs' side, you have your own set of
21 issues in terms of how you are managing the case and your time,
22 and the resources that you utilize have to be judicious so that
23 you can accomplish all that you need to accomplish with
24 available resources.

25 So, I have found in my experience as a judge both in

1 State and Federal Court that often times the best attorneys are
2 the ones I see least because they really do work things out. I
3 don't want anyone to think, whether it's a client or a young
4 attorney, that because these parties are just working things
5 out, that they must not be fighting hard or holding strong to
6 their positions. Not so, not so at all. And the fact that
7 you -- you have brought a new definition and meaning to the
8 words meet and confer.

9 I think I mentioned that in -- actually, I didn't
10 mention it in the interviews last week, but I happened to be on
11 a Zoom panel this past weekend for the Balch Institute and the
12 ALI on how judges are dealing with COVID, and I spoke a little
13 bit about the MDL, nothing specific, just generally about how
14 to manage an MDL.

15 To your point, Mr. Petrosinelli, it is getting a lot
16 of attention, this case, so I think that you all can serve as
17 the role models that -- continue to serve as the role models
18 that you have been already serving as.

19 I said that it brought a new meaning to meet and
20 confer in the sense that many judges get very discouraged when
21 they know their local rule requires meet and confer and yet
22 they will see motions filed, there will be a one liner that
23 says I tried to reach opposing counsel at 4:59, and he or she
24 wasn't available, and the motion is filed at 5:00, and it is
25 very frustrating to judges.

1 We don't mind resolving disputes, that is our job, but
2 as I began, I think the parties and the rules reflect that,
3 that it should begin, particularly in the areas of discovery,
4 with the parties trying to work it out first.

5 You have brought meet and confer to a whole nother
6 level. I hope that it raises the bar for all attorneys, not
7 just in MDLs. But surely if you can do it in an MDL of this
8 nature, then attorneys in single Plaintiff and single Defendant
9 cases can absolutely do it. With Zoom, maybe more judges are
10 going to require the meet and confer be done by Zoom and not
11 just by a text or an email, because a lot can get lost. The
12 tone can't be conveyed in the same way as a face-to-face
13 through something like a Zoom conference.

14 So, I just can't say enough with how pleased I am. I
15 recognize there are going to be days along the road at
16 different mile markers where you are going to come to us and
17 you are at odds, and that is okay, too. That is okay, too.
18 That is why we are here, but I want everyone to recognize that
19 attorneys can work together just as you have to try to reach
20 compromises. In fact, you are in the best position to reach
21 compromises and put your own nuances into these proposed
22 orders.

23 I often say to attorneys getting ready for trial, I'm
24 a big proponent of dispute resolution. If cases can get
25 resolved through mediation, I think that that is often very

1 beneficial. Why? Because the attorneys can put their imprint
2 on what the outcome will be. You throw it to a jury and it is
3 unknown, it's uncertain, and there are a lot of risks
4 associated with that. Some cases need to go to trial and that
5 is why we, as judges, preside over trials.

6 I am just so pleased, and I thank you for your opening
7 remarks, and with that, feel free to turn it over to your next
8 group of presenters.

9 *MR. McGLAMRY:* Thank you, your Honor. Let me comment
10 and also express my appreciation for the comment that you just
11 made about the fact that if we can work together is not a sign
12 of weakness. I kind of think it is actually as a sign of
13 strength. I have thought, as I have practiced for a very long
14 time, that in terms of your speed or efficiency, what you lose
15 on the curves, you make up on the straightaways, and I think
16 that that will help us in this litigation.

17 As we move into this next segment, Roopal Luhana and I
18 will start, and we are going to put those four brand
19 manufacturer production issues into one sort of presentation,
20 because even though we have broken it out, we have dealt with
21 them globally and our discussion will be dealt with that way.

22 With that said, I will disappear.

23 *MR. PETROSINELLI:* On the Defense side, your Honors,
24 Mr. Friedman will handle kind of the RMC, and then we will turn
25 it over as appropriate to other defense lawyers. With that, I

1 will sign off.

2 *THE COURT:* Okay. Good morning, Ms. Luhana, and good
3 morning, Mr. Friedman. How are you?

4 *MS. LUHANA:* Good morning, your Honors, it is nice to
5 be before you for the first discovery conference. Roopal
6 Luhana of Chaffin Luhana for the Plaintiffs. Judges, this
7 morning I plan to cover the status of Plaintiffs' discussions
8 with the four brand manufacturers, which include GSK, Pfizer,
9 Boehringer Ingelheim, BI, and Sanofi on the initial production
10 of discovery.

11 Your Honors, as you have heard, the parties have been
12 working in good faith to move discovery forward. Plaintiffs
13 started this process when we initially submitted the initial
14 disclosures proposed order to the Defendants on March 3rd. Our
15 proposed order was adopted from Judge Fallon's initial
16 disclosures order from the Xarelto litigation. The Plaintiffs
17 believe that was a fair and reasonable place to start.

18 Judges, Plaintiffs' proposed order identified
19 categories of documents for the Defendants to initially
20 produce, some of which included the new drug application file,
21 or investigational new drug application file, and all its
22 underlying documents.

23 This is the application that Defendants submit to the
24 FDA to get a drug approved for sale and marketing in the U.S.
25 It contains all the clinical tests, what the ingredients of the

1 drugs are, what the results of the animal studies show, how the
2 drug behaves in the body, and how it is manufactured, processed
3 and packaged. We thought Defendants would have these documents
4 segregated and that they would be easy to produce.

5 We also asked for the organizational charts of the
6 Defendants so Plaintiffs can learn who the key players are who
7 worked on Zantac, for example, individuals who worked on
8 pre-clinical, clinical studies, sales marketing, pharmacal
9 vigilance, regulatory, quality control and other relevant
10 departments.

11 We also asked for final agreements concerning the
12 transfer, control, or sale of the Zantac NDA, IND, trademark or
13 license, and also distribution agreements, so we could learn
14 who was responsible for what and when specifically.

15 Judges, subsequently, we supplemented our discovery
16 requests and included some of the following categories of
17 documents by letter for the Defendants to produce, including
18 the master regulatory file for each product, including all the
19 regulatory files, the submissions, communications, minutes of
20 meetings or teleconferences between the Defendants, including
21 any of their predecessor companies, joint venturers, parent
22 companies or subsidiaries and the FDA.

23 We also asked for Defendants' annual reports, their
24 adverse event database related to Zantac, Ranitidine adverse
25 events, also some of the Defendants' standard operating

1 procedures, such as ones for record retention, pharmacal
2 vigilance and regulatory.

3 Afterwards, on April 21st, the four Defendants
4 collectively then provided to the Plaintiffs a one-page outline
5 of documents they agreed they would produce to the extent they
6 had them. It was a general starting point for individual
7 discussions we have had with the Defendants. Some of those
8 documents were the INDs for the time period the Defendant was
9 responsible for the IND for the product, NDAs for the time
10 period Defendant was responsible for the NDA for the product,
11 annual reports, submissions to the FDA, a report of adverse
12 events, final product labeling and documents sufficient to
13 identify distributors.

14 Since we received that one-page outline from
15 Defendants, starting on April 23rd, we began the meet and
16 confer process with Defendants individually, as you heard from
17 the parties. Since that time, Judges, the Plaintiffs and the
18 four brand manufacturers have met and conferred multiple times
19 via Zoom to discuss the initial discovery and discuss with
20 Defendants what they have and what they can produce. We have
21 also exchanged several emails and letters regarding the same.

22 Your Honors, as you can appreciate, since Zantac had
23 been on the market for over 35 years, and changed hands between
24 four brand manufacturers there are different circumstances each
25 Defendant faces. As such, we continue to meet and confer, but

1 we have separate breakout sessions with each of the brand
2 manufacturers and we have found that to be conducive to moving
3 things forward.

4 The reason it has been difficult to do so collectively
5 with the brand manufacturers is because, as Mr. Petrosinelli
6 referenced, each Defendant did things differently, they stored
7 things differently, they had different systems that changed
8 over time, they had different policies, and how and where they
9 preserved their data is also different. That is why it
10 warranted doing separate meet and confers with each of the
11 Defendants.

12 For some of the Defendants, like Pfizer for example,
13 while Mr. Petrosinelli has been amenable to producing
14 responsive documents we have requested, the issue there is that
15 Pfizer sold its consumer health business to J&J in 2006, and
16 then it sold its Zantac ODC portion to BI also. Therefore,
17 most of the Pfizer employees and documents related to Zantac
18 left Pfizer with those sales. Pfizer has stated that to the
19 extent it has responsive documents or paper documents and
20 limited electronic documents.

21 However, Mr. Petrosinelli has offered to produce
22 documents from other litigations Plaintiffs have identified,
23 such as the PPI litigation. Although Zantac isn't the issue of
24 the PPI litigation, there were studies produced where
25 Ranitidine is a comparator drug in those studies and Pfizer has

1 agreed to produce those here.

2 We have also asked other Defendants to produce
3 responsive documents they had that were produced in other
4 litigations. So, the brand manufacturers have generally agreed
5 that they can start producing documents on a rolling basis
6 which can begin at the end of May or sometime in June. The
7 parties continue to talk and made good progress with the
8 initial production.

9 Judge Rosenberg, you raised yesterday what the parties
10 need from the Court at this time. We have been working well
11 together, and therefore want to continue to meet and confer and
12 work through the issues. To the extent in the future where
13 discovery issues do a rise, and we know they will, we will let
14 the Court know and request a discovery conference with Judge
15 Reinhart.

16 On the ESI vendor, which is a separate issue, PSC will
17 use Open Texts as our ESI vendor. We are currently waiting on
18 their disclosures and once we receive them, Ms. Finken will
19 sign the contract with them.

20 And one final thing I do want to raise before I pass
21 the Zoom screen to Mr. Friedman is that one of the hurdles that
22 has been raised by some of the Defendants is that they don't
23 intend to produce any documents until the confidentiality order
24 and the ESI protocol are in place.

25 As we informed the Court, we are working to reach

1 agreement on these proposed orders and will work to do so by
2 June 1st, but I thought it was an important point to raise at
3 this time as it dictates the beginning of discovery.

4 In conclusion, your Honor, do you have any questions
5 at this time that I can address?

6 *MAGISTRATE JUDGE REINHART:* Good morning, Ms. Luhana,
7 nice to meet you in person. I enjoyed watching your interview
8 last week.

9 I just want to say this to all the parties, and I hear
10 you on your last point about the confidentiality orders and the
11 foundation orders that Mr. -- I think Mr. McGlamry used that
12 term, the foundation orders. I am happy to get involved with
13 you all sooner rather than later. If you feel there is a need
14 to have me involved before June 1st -- I certainly don't want
15 to take away from the fine efforts everyone is making to
16 cooperate and reach agreement on those things, but time does
17 matter.

18 So, if you think even carving out one order or two
19 orders discretely, if you think you are close enough to the
20 finish line that I can help you get over it, I am happy to have
21 sort of a discovery mediation session and talk it out.

22 *MS. LUHANA:* Thank you, your Honor. We appreciate
23 that. I will discuss it with the team internally and we will
24 circle back with the Court.

25 *THE COURT:* Thank you, Ms. Luhana.

1 Mr. Friedman.

2 *MR. FRIEDMAN:* Thank you, your Honor. Thank you, Ms.
3 Luhana. Can you hear me okay?

4 *THE COURT:* Yes, we can. So our court reporter knows,
5 it is Mr. Friedman.

6 *MR. FRIEDMAN:* My name is Ralph Friedman. I am one of
7 the attorneys for Boehringer Ingelheim. I'm glad that you can
8 hear me okay because my audio/visual consultant is taking a
9 history exam this morning. If things go south, I am in
10 trouble, or she is.

11 *THE COURT:* You can't help that history exam. I know
12 it is a dilemma, where do you want your kids most, helping you
13 or doing their school work. So far, so good.

14 *MR. FRIEDMAN:* If we hear any squealing noises, that's
15 my wife teaching first grade virtually in the next room.

16 *THE COURT:* I applaud you and everyone. Everyone is
17 juggling a lot and you are just reminding me of that right now
18 because in a way things have gone so seamlessly last week and
19 yesterday, but behind the scenes there are probably a lot of
20 stories like yours, Mr. Friedman, where we, or you, or others
21 are juggling health issues with family or friends, two working
22 spouses, children who need to finish up.

23 So, I think I said it last week, that while I
24 appreciate how hard everyone is working and don't want to say
25 anything that will dissuade anyone from continuing on that

1 path, I do recognize that everyone is juggling a lot in these
2 unusual times and one's self preservation, health, and safety
3 always comes first.

4 So, thanks just for reminding us of the reality of the
5 times we are going through right now.

6 *MR. FRIEDMAN:* Thank you, your Honor.

7 I do want to get to the substance, but I will just
8 echo what many of my colleagues have said about the cooperation
9 that has gone forward. I think it is a little counter
10 intuitive, but being at home and having dogs barking and
11 children crying has in some ways been helpful because it
12 humanizes everyone, and we all realize opposing counsel are
13 people, too. Hopefully, I think it will continue as we head
14 back to a more routine way of working.

15 But Ms. Luhana gave a good overview of the process
16 that we worked through, so I won't repeat things. I just want
17 to mention a few of the circumstances and challenges that the
18 Defendants are working through because, for the most part, they
19 are going to continue for at least a little while longer.

20 And I will say to Judge Reinhart, it is nice to meet
21 you as well. We look forward to working with you, too, and I
22 appreciate your willingness to get involved as early as we can
23 use you, and we may very well be taking you up on that. So,
24 thank you.

25 The first thing I want to just mention, and it has

1 been mentioned a little bit, as we all know, we are dealing
2 with a product that goes back four decades, so the factual
3 scope of this litigation is large. That span of years alone
4 creates challenges as employees of Defendants are more likely
5 to have moved on to other jobs or retired, company operations
6 and structures have evolved and changed in both formal and
7 informal ways. That is one thing that Defendants are working
8 through.

9 The second thing is that, as Ms. Luhana mentioned,
10 there have been changes in the marketing authorization holders,
11 the holders of the new drug applications and who is able to
12 market Zantac both for prescription and over the counter use in
13 the United States. The Court heard a lot about the history of
14 Zantac yesterday, so I won't belabor it. But what this means
15 is that some Defendants don't market or sell any Zantac today,
16 and some market it differently than they used to.

17 So, all of this makes our discovery preparations a
18 little bit more challenging as we investigate what became of
19 files and information during these various transitions. And as
20 Ms. Luhana mentioned, these transitions involve people. Some
21 of the transitions were actual transfers of entire consumer
22 health businesses where the people went, the business went, the
23 files went, so there is a lot to work through.

24 Not surprisingly, and this has been mentioned as well,
25 given the different time periods and the operations, the

1 Defendants have different types of documents. We talked a
2 little bit about paper, Mr. McGlamry's old friend, and a lot of
3 data, too, electronic data. Pharma manufacturers didn't
4 operate in 1985 the way they operate in 2015, so there are some
5 differences that we are working through, evolutions over the
6 years.

7 The paper, it is a challenge, it is often stored in
8 offsite warehouses or even on-site in places that are not
9 places people access in the regular course of business. It is
10 challenging in any environment, it has to be physically handled
11 to get it to the scanners and vendors, so this is even more
12 challenging in these COVID-19 times.

13 On that note, COVID is making everything harder.
14 Defendants have multiple locations, facilities, and
15 availability and access to people and data is varied, some are
16 available and working as usual, some are not, essentially shut
17 down.

18 Some of the things we would usually do as defense
19 lawyers, the things we would usually do on site we are trying
20 our very best to do remotely. It is just not always possible
21 and it is not always as good. Sometimes you have to see the
22 file room that someone is describing to you or sometimes you
23 need the person who knows how the files were kept to actually
24 show it to you. Some of the facilities are closed or operating
25 on a limited basis, and some of the people we would like to

1 speak with have limited availability they are dealing with
2 their own challenges at this time. So, that is what we have
3 been and continuing to work through.

4 We do rely on vendors for different aspects of the
5 discovery process, and vendors have COVID-19 issues, too, so
6 that has been something we have been dealing with. They might
7 may not be able to physically collect and copy hard copy
8 documents as fast as we'd like them to, or they might not have
9 the people available to do the other tasks that can go along
10 with electronic discovery.

11 These are all things that we have encountered, we have
12 done our very best to address. We have addressed them, and I
13 think that is good news, is that we have made good progress.
14 All of these challenges are being met, all of the Defendants
15 are working on their initial productions, and we are doing so
16 in close communication with the Plaintiffs.

17 In terms of the what are we producing, Ms. Luhana
18 talked about the regulatory files, and I will just give a
19 little bit more information about that because that is
20 something that we are focused on up front. It is something
21 that is typically among the very first things produced in any
22 pharmaceutical products liability litigation.

23 You heard yesterday about what is called the IND, NDA,
24 Ms. Luhana discussed that as well. That term can be used a
25 little differently. Technically it refers to, in some

1 instances, just the actual applications that are given to start
2 looking at a new drug, to investigate a new drug, and also to
3 get it approved. Some Defendants -- and we use that term to
4 refer sometimes to the entire correspondence file with the FDA
5 over the life of the drug because the IND, and especially the
6 NDA, it is kind of a living document where you are making
7 submissions on a regular basis to the FDA under your NDA core
8 product.

9 So, those files are large files that include data
10 about testing, about manufacturing processes, the chemistry of
11 the drug, the labeling that goes on the product, whether it is
12 prescription or whether it is an over-the-counter product.
13 Every time the manufacturer wants to get approval for a new use
14 or a new indication for a product or for a new formulation, so
15 if you want to go from a capsule to a tablet or add a liquid
16 formation, you have to add to your new drug application. That
17 is all in there as well.

18 All four brand manufacturers have agreed to produce
19 and to prioritize the production of those files with the goal
20 of getting these productions in the next three to six weeks.
21 The first production in any case like this is always the
22 hardest because you have a process that you have organized and
23 you are using it for the first time and you have to work the
24 kinks out, but we are doing that, and we remain optimistic that
25 we are going to meet the production schedule that we have

1 talked about with Plaintiffs.

2 This production will give Plaintiffs millions of pages
3 of documents in the 40-year regulatory history of Zantac and
4 Ranitidine and it will give the parties a very good look and an
5 early look at some of the key documents in this litigation.
6 This does include information about the FDA's recent market
7 withdrawals of Zantac and Ranitidine and also communications
8 with the FDA in response to inquiries about NDMA and Zantac.
9 So, there will be some key documents in there for everyone to
10 review. That is one of the big initial productions.

11 Then there are a number of other categories of things
12 we are talking about. Ms. Luhana mentioned some, including the
13 standard operating procedures, information about the employees
14 who are significantly involved with Zantac, information about
15 manufacturing, a number of categories. Some of these,
16 obviously, are easier to produce quickly, others are harder, it
17 just depends on the nature of the information.

18 So, that is the kind of thing that we are having
19 regular communications with the Plaintiffs about and making
20 progress and really looking forward to continuing those
21 conversations, in some cases as early as tomorrow.

22 At this point, unless the Court has any questions,
23 that is really all I wanted to mention right now.

24 *THE COURT:* Okay, thank you so much, Mr. Friedman.

25 *MR. FRIEDMAN:* Thank you, your Honor.

1 MR. McGLAMRY: Back again, your Honor.

2 I think we will go next into the generics and I will
3 discuss that in just a moment. I wanted to followup on sort of
4 what we have already been talking about. Sometimes I think we
5 might lose sight when we break these things out individually in
6 terms of either individual productions or the individual
7 orders, that we miss kind of the concept that -- and I know on
8 Plaintiffs' side we are obviously ready to get rolling, to get
9 production started, which we realize we need the orders to do
10 that.

11 The Defendants on the other side have an interest in
12 getting this going because they are interested in getting to
13 general causation within a length of time.

14 So, we truly have on both sides an overriding interest
15 in getting this put together, and based on what I have seen us
16 do collectively over the past several months, is that by June
17 1st, I think we will get these orders in place, and if not, it
18 will come down to some very discrete pieces that will be easy
19 enough to present to you, Judge Reinhardt, and to Judge
20 Rosenberg, and the same with the production.

21 As Rob mentioned, you know, there are these issues we
22 are having to deal with and everybody is dealing with them
23 remotely, as well as just the nature of the types of production
24 from the various Defendants, and we will get there.

25 I feel very, very confident that all of that will take

1 place because, as I sort of began in the opening about what
2 your Honor did with the PTO 16 to sort of get us to sit down
3 and talk about what we can do on the front end, I think that
4 everybody understands what those things are, which is to get
5 those fundamental and foundational orders in place and to be
6 able to get some discovery going.

7 As Rob mentioned, in a pharmaceutical case you have
8 some standard things, you know, that we all know about on the
9 front end, and we are doing that. I don't want either of your
10 Honors to feel like we are not getting there, because we are,
11 my gut tells me we will get there, and it leads me into what I
12 think is also essentially a favorable report about the
13 generics.

14 What I mean by that is we have had discussions with
15 the generics, with Mr. Yoo and Mr. Brian, and communicated, we
16 actually had discussions last night, and I believe we are close
17 to having some understandings and agreements with them, both
18 individually and hopefully on behalf of all of the generic
19 manufacturing Defendants.

20 Essentially, what I was hoping to do this morning, and
21 have Mr. Yoo and Mr. Brian confirm, we have agreed, as PTO 16
22 requires, to sit down with them and -- this week and discuss
23 document categories that we have already provided to them.

24 Ms. Goldenberg had initially planned to come up and
25 talk about this because she and Mr. Maderal have been, on our

1 side, working to put together those materials, sort of a
2 document that we identified as the generic manufacturer core
3 discovery. It is a one-page document we have come to use in
4 our discussions back and forth. And Ms. Finken and I are going
5 to sit down with that group, as a group, like we started with
6 the four brand manufacturers prior to this as a group, and
7 discuss this discovery, and as PTO 16 requires, to meet and
8 confer concerning the categories of relevant documents that can
9 be reasonably produced in the near term, as well as discuss a
10 time frame for production of additional materials as part of an
11 initial production. And Mr. Yoo has agreed to do that, and we
12 are going to try to meet, I believe, on Friday to do that.

13 Although we sort of are getting ready to proceed with
14 full production -- excuse me, full discovery that we discussed
15 in the case management context yesterday, what we have
16 discussed with Mr. Yoo is that we will first do these meet and
17 confers with regard to their initial production and a time
18 table for that, and will not be serving them with formal sets
19 of discovery requests until we have done that, and have those
20 discussions and follow through with that.

21 And in return, it is our understanding that they
22 have -- at least the two lawyers individually have agreed not
23 to seek a stay of discovery pending the filing or briefing or
24 ruling on a motion, including preemption by the brand
25 Defendants. I believe they are still in discussions with the

1 remaining members of the brand manufacturing Defendants, but
2 hopefully we will have that answer and we will have that
3 completed by the time we have our discussion on Friday.

4 So, again, I think that sort of with the Court's
5 emphasis and Special Master Dodge's input and facilitation, my
6 experience has been that, even with a husband that has had to
7 be in quarantine and a two-year-old in her arms, she can make
8 us get together on a moment's notice and get things done, and
9 that has already happened even, as I mentioned, as of last
10 night.

11 At this point, I will sort of defer to Mr. Yoo if I
12 have stated our discussions correctly. Thank you.

13 *THE COURT:* Thank you. Good morning, Mr. Yoo.

14 *MR. YOO:* Good morning, your Honor. Thank you, Mike.

15 I agree with what Mr. McGlamry has related to the
16 Court, we did have a productive conversation yesterday presided
17 by Special Master Dodge, so I do want to thank her for her
18 efforts. I think we got a good lot done. It was a good start
19 to a meet and confer process with the Plaintiffs on behalf of
20 the generics. We look forward to continuing to work with Mr.
21 McGlamry and his colleagues and work through these issues.

22 *THE COURT:* I appreciate it, Mr. Yoo, and I
23 appreciated hearing from you yesterday, and I think it was
24 important because I think it led probably to some discussions
25 after yesterday's session and this evening -- or last evening,

1 rather, and, you know, I do appreciate and Judge Reinhart
2 appreciates every Defendant is going to have its own set of
3 issues, and generics are not the brands, and the retailers are
4 different than the generics, which are different than the
5 brands, so we do have enough of an understanding now to realize
6 that it is not necessarily going to be one size fits all.

7 But I can just say, you know, generally, my experience
8 has been, and I think Judge Reinhart shares it as well --
9 again, we take every case on its merits. It is not we have
10 always done it this way, so we are going to do it this way in
11 this case. Generally speaking, in my experience, keeping cases
12 moving along, not staying discovery pending the Court's ruling
13 on certain things, in my experience has not worked well.

14 It is not to say I don't allow people to be heard on
15 it and at the end of the day, if one feels strongly and that is
16 in one's client's best interests, of course you will have the
17 opportunity. It sounds like you may have moved off of that at
18 least slightly.

19 Particularly when documents may have to be produced
20 anyway, albeit through a different avenue, through third-party
21 production or things of that nature, I always ask myself, are
22 these documents going to be produced anyway? If so, why not
23 try to do it amicably and on the front end?

24 We will get to those motions. I do realize and I am
25 very mindful of motions that need to be heard that can be

1 partially dispositive or potentially, as you alluded to, and
2 maybe hopefully on behalf of your clients fully dispositive.
3 We don't know that yet, but the best way to know that is to
4 allow the parties do the necessary discovery to get to the
5 point where issues ripen for the Court's disposition. There is
6 no one who is more committed then Judge Reinhart and I to
7 getting those issues ripened so I can rule on them. If it
8 means parties are out or issues are narrowed, it is obviously
9 beneficial to the parties, and it is beneficial to the Court,
10 quite frankly.

11 It is very hard as a judge to manage issues that
12 shouldn't necessarily be in a case, claims that maybe shouldn't
13 be in a case, parties that maybe shouldn't be in a case, and I
14 realize that you don't know that on the front end. That is why
15 there is discovery and that's why we take baby steps, and to
16 use the analogy yesterday of the marathon, you don't just show
17 up to run a marathon, you need the food, you need the water,
18 you need the equipment, you need the running shoes, and I view
19 discovery that way.

20 Now, do you need the most expensive running shoes?
21 Maybe not, so maybe the generics. It is tailored and scaled
22 back, and maybe some of the other Defendants, hypothetically,
23 the brands. So, I do get that, but, you know, to just kind of
24 put a stay -- often times I will see motion to stay pending
25 outcome of a motion to dismiss, and I have to evaluate that and

1 think, is that really serving the goals of all of the parties
2 here? I make my ruling based on what is presented before me.

3 I applaud your willingness to sit down with the brand
4 and the retailer, and to, it sounds like, agree in some measure
5 for some production, and if down the road things are being
6 asked of you and you think it is over reaching because of your
7 unique position representing generics, I am sure you will bring
8 that to the Court's attention. I do want to acknowledge that I
9 do appreciate what you are representing to the Court today
10 based on the meet and confer. So, thank you.

11 *MR. McGLAMRY:* Thank you, your Honors. At this point
12 I will turn it over to the retailer crowd and Mr. Pulaski on
13 our side and Ms. Johnston for the retailers.

14 *MR. PULASKI:* Good morning, your Honor.

15 *THE COURT:* Good morning. How are you?

16 *MR. PULASKI:* I am good. Good morning, Judge
17 Reinhart, Special Master Dodge, and everyone else in the
18 courtroom, nice to be able to finally chat with you guys again.

19 Suffice to say Ms. Johnston and our group have the
20 proper apparel, necessary shoes, and all the equipment we need
21 for this marathon. We have been working diligently with
22 Ms. Johnston on all discovery matters as they relate to the
23 retail Defendants, and at this point, I don't see any
24 roadblocks with respect to discovery that we have not been able
25 to either work through or are not currently discussing in a

1 very meaningful way.

2 I am happy to report that with respect to the
3 prescription records and the loyalty program records, which I
4 am sure Special Master Dodge has kept you informed of, we have
5 a tentative agreement in place that will allow for the defense
6 to provide this data as part of the registry process as opposed
7 to a process as part of discovery, or traditional discovery,
8 and this will save both sides a lot of time and a lot of money,
9 and again, as we have not yet finalized terms, I am confident
10 that we will have this wrapped up shortly.

11 I know that there are specific challenges presented to
12 Ms. Johnston because there are some retailer Defendants that
13 have not yet hired outside counsel or who may not be served at
14 this point, but I can -- I know that she will be able to share
15 with the Court those issues as they relate to her, and I am
16 sure that if I misstated any aspect of our tentative agreement,
17 she will point it out to the Court and then call me off line to
18 remind me of how I misstated things.

19 One issue that we face with respect to retailer
20 Defendants in this case is that -- and with regard to other
21 discovery issues, is that the Plaintiffs' side and our group
22 has determined that there will be additional retailer
23 Defendants that we will name once we start filing the claims
24 with the Master Complaint, and that as these Defendants have
25 obviously not made an appearance in court as of yet, we will be

1 appropriately serving them.

2 That presents a challenge also to Ms. Johnston, who
3 has not yet had the opportunity to speak to the attorneys for
4 those Defendants, but I know that per our discussions, she will
5 continue to advance our collective efforts and work diligently
6 to bring them into the fold once they make an appearance.

7 Really, things are going very smoothly with the
8 retailer Defendants, at least from our perspective, and at this
9 point, probably best just to turn it over to Ms. Johnston and
10 let her give you her side of things.

11 *THE COURT:* Okay. Good morning, Ms. Johnston. How
12 are you?

13 *MS. JOHNSTON:* Doing well, thank you. Thanks to both
14 of you, Judge Rosenberg and Judge Reinhardt, for the opportunity
15 to speak on these issues, and Mr. Pulaski and his colleagues
16 for working really well with us over the last couple of weeks.

17 I apologize. For the benefit of the Court Reporter,
18 my name is Sarah Johnston, and I am here as the interim liaison
19 counsel for the retailer and pharmacy Defendants.

20 I agree with what Mr. Pulaski has said generally, and
21 I think that speaks to the fact that he has been willing to
22 work really well with us, but I do want to offer the Court a
23 little bit of context about where things stand with the
24 retailers. Some of the issues Mr. Pulaski touched on, but
25 there are a few others that bear discussion to ensure that the

1 Court understands where we are coming from and what the
2 challenges are going to be as we move forward into further
3 discovery.

4 So, I think that in terms of where we stand in the
5 supply chain and the role of the retailers in this litigation,
6 I think that this group of Defendants is fairly uniquely
7 situated. We are not manufacturing entities and, as Mr.
8 Pulaski alluded to just now, we have a potential to become a
9 larger group depending on how the Master Complaint shakes out.

10 While everybody has a general understanding of what a
11 pharmacy does, what a retailer does, these are not identical
12 entities. They serve similar functions, but they don't have
13 identical data, they don't have identical infrastructure, and
14 therefore, they are not going to have identical discovery
15 capabilities.

16 I say all that to pick up on what Mr. Pulaski touched
17 on, which is that there are a number of retailer Defendants who
18 haven't appeared yet or who haven't even been named yet, so
19 there is some difficulty in trying to navigate the balance of
20 wanting to move forward with discovery, while at the same time
21 wanting to make sure that the key stakeholders are going to
22 have the opportunity to weigh in on what is being negotiated
23 and discussed with Plaintiffs.

24 I would say additionally, I think that not only do we
25 need to confirm buy in with key parties, I think that there is

1 going to be a secondary issue that we are going to have to
2 grapple with, and I have no doubt that we will be able to work
3 through it, but that is proportionality in the sense that we
4 don't have a fair sense of the number of Plaintiffs who
5 submitted initial census data who are going to ultimately
6 pursue claims against retailer Defendants, and if they are,
7 whether they are going to name multiple retailers, which we
8 believe is a possibility.

9 And then with regard to the specifics of some of the
10 data that we have been discussing, it also could mean that
11 certain retailer Defendants who collect or store or keep
12 information such as loyalty card data, which Mr. Pulaski
13 touched on, are going to bear a bigger discovery burden than
14 those who don't keep track or keep point of sale information or
15 perhaps a shorter retention policy for that data. So, that is
16 an issue that we are going to have to work through as we work
17 out these orders.

18 The flip side of that I think is, and it was discussed
19 a lot during yesterday's portion at the initial status
20 conference, and that is that product identification is going to
21 be a key issue for this litigation, and we understand that, and
22 we understand the retailers play some role in getting to
23 product identification to the extent that that data exists.

24 That is why we have chosen to focus on this as the
25 initial discovery from these Defendants, while at the same time

1 recognizing that there may be some time before we are able to
2 get a complete buy in from for all the key parties.

3 I would say substantively, in terms of what we are
4 trying to work out and avoid and also to address some of the
5 proportionality concerns, is the idea that many of these
6 companies, at least based on my experience and the
7 conversations that I have been having, for both prescription
8 data and OTC loyalty card data, to the extent that that exists,
9 the process of obtaining that information at times and often is
10 a manual process.

11 So, there is going to be some work that Mr. Pulaski
12 and I are going to have to do in order to figure out a way to
13 hopefully automate that process to lessen the burden on these
14 Defendants. We are working on that process and I think it is
15 something that we can do, but given that we suspect that
16 prescription users of Zantac versus OTC Ranitidine and Zantac
17 are going to be a smaller subset of the data that we are
18 planning to collect, that is where we have chosen to focus our
19 efforts first. I think we will be able to iron out an order
20 that addresses collection and production of prescription
21 records in the near term, hopefully in a way that is workable
22 for these Defendants.

23 And once that is worked out, we will move into the
24 loyalty card data programs or any other point of sale data
25 programs that exist for various retailers. And as that is

1 going to be a trickier piece of the puzzle, hopefully the
2 prescription discussion will be informative as to how that next
3 stage will go.

4 This all, of course, depends on the abilities of the
5 individual retailers who are somewhat unknown, but I am
6 confident, based on what has happened so far in working with
7 Mr. Pulaski and his team, that we are going to continue to make
8 progress and hopefully have some work product to put in front
9 of the Court in the short term.

10 *THE COURT:* Thank you, Ms. Johnston.

11 *MS. JOHNSTON:* Any questions or tell you anything else
12 that you would like to know?

13 *MAGISTRATE JUDGE REINHART:* Good morning, Ms.
14 Johnston, this is Judge Reinhart. How are you this morning?

15 *MS. JOHNSTON:* I am doing well, thank you, your Honor.

16 *MAGISTRATE JUDGE REINHART:* It occurred to me it is
17 7:15 a.m. where you are; is that right?

18 *MS. JOHNSTON:* I just pulled the graveyard shift.

19 *MAGISTRATE JUDGE REINHART:* I was going to commend you
20 for being as articulate and thoughtful as you are at 7:15 in
21 the morning. I don't think I could accomplish that.

22 *MR. PULASKI:* She was equally as articulate at 12:30
23 last night just in case you were wondering.

24 *MAGISTRATE JUDGE REINHART:* Wow. Well, thank you, Ms.
25 Johnston.

1 I do want to respond to some of what you said. I
2 really appreciate that you are in a bit of a difficult
3 situation here because you are the liaison counsel for people
4 who aren't yet formally in this lawsuit.

5 I suspect from the census data and from your
6 discussions with Mr. Pulaski that you have a sense, and I am
7 sure he shared with you a sense of who is likely to be brought
8 into this litigation on the retailer side, but again, they are
9 not your clients yet, so I appreciate that you are in a tough
10 spot in that regard.

11 I would ask you, to the extent you can, I think it
12 would be very helpful to the process to continue to reach out
13 to the people who are expected to be brought in to encourage
14 them, from my perspective and Judge Rosenberg's perspective,
15 that this is not a time to put form over substance. If they
16 are going to be brought into the lawsuit, they are going to be
17 brought into the lawsuit. They are going to get served and
18 they are going to get served with discovery.

19 The day will come when they are going to have to
20 produce documents, and I think the sooner that they simply
21 accept that is better because, as Judge Rosenberg also said,
22 whether they produce those documents as parties or they produce
23 those documents as third-party subpoena respondents, again,
24 they are going to get served.

25 No one is prejudging how much they are going to have

1 to produce because, let's face it, proportionality is
2 important, and we will certainly respect any arguments on
3 proportionality and relevance, but as you acknowledge, and I
4 certainly appreciate your candor, product identification is an
5 issue in this case. (Inaudible.) Some of that data is not
6 relevant. Now, how much of it is for a longer discussion and
7 something that the Court is happy to get involved in if the
8 parties can't work it through.

9 I guess what I am asking you to do is, to the best you
10 can, through your good offices reach out to the retailers who
11 are not yet in the case, put them on notice of what is coming,
12 try to bring them into the tent here and be a facilitator for
13 the Court in that regard. That was point number one.

14 And then the second point which is related to that
15 really does have to go to the proportionality and the fact
16 that, again, whether it is existing clients or whether it is
17 the not yet in the case people, there is going to be relevant
18 evidence that is going to have to come out of the retailers.

19 We can have longer discussions about what that
20 universe looks like, but, again, the sooner that they can be
21 brought in and you and Mr. Pulaski can continue the very
22 productive discussions you are having to try to kind of define
23 the core of that information and agree that that is going to
24 come out and get that done cooperatively, then around the
25 margins we will have an ability to have a dialogue there.

1 I want to thank you for everything you are doing and
2 acknowledge the difficult position that you are in. I
3 appreciate the collaborative efforts that you and Mr. Pulaski
4 are putting into this.

5 I'll use this as an opportunity to raise one other
6 issue that is not specifically related only to the retailers,
7 but generally goes to third-party discovery, because one of the
8 things I heard yesterday, maybe it was Mr. Gilbert -- I don't
9 remember who it was, but it seems to me there is going to be a
10 lot of third-party discovery in this case, in part because, as
11 I think Mr. Friedman just mentioned, the companies don't have
12 all the data, the brands don't have the data anymore in some
13 situations. And also, I heard that a lot of the epidemiology
14 data and the information that is going to underlie the Daubert
15 proceedings in this case is going to come from third parties.

16 I'll just remind everybody that when you serve
17 third-party discovery Judge Rosenberg and I lose control in
18 some respects over that discovery. As you all know, if you
19 serve a Rule 45 subpoena in Wisconsin, the party in Wisconsin
20 objects in front of a judge in Wisconsin, they don't object in
21 front of me. That judge in Wisconsin may not have the same
22 urgency and the same commitment to move this litigation forward
23 that Judge Rosenberg and I do.

24 So, what we don't want to have happen is our carefully
25 constructed agreements between the parties to this case get

1 bottlenecked because a judge somewhere else in the country
2 doesn't expedite a ruling on a motion to quash a third party
3 subpoena.

4 That is a very long way of me saying to all of the
5 parties involved in the discovery in this case, as part of your
6 planning, please don't lose sight of that fact, and to the
7 sense you can, keep it -- I don't want to tell you to
8 prioritize it because you have so much else to do, and everyone
9 is working so hard in this case, but just please be mindful
10 that third-party discovery is a potential bottleneck in this
11 case and to just be sensitive to that as you plan your
12 discovery.

13 Thank you.

14 *MS. JOHNSTON:* Thank you, Judge. I think your first
15 comment is going to be a good encouragement to get some of
16 these parties in the fold and I think the advice is very good,
17 and we will certainly make those efforts. I very much
18 appreciate that. Thank you.

19 *THE COURT:* Ms. Johnston, I just have one question,
20 and then maybe Mr. Pulaski can also address it.

21 If I understood it, yesterday you said, or I heard,
22 there were so many presenters, that retailers aren't
23 manufacturers, or maybe you just said that, but yesterday I
24 understood that some retailers have house brands.

25 So, can you just talk to me about the house brands and

1 the relationship with the retailers, and particularly where
2 those house brands, the retailers are the manufacturers, or
3 instances when they are not, and how that would impact
4 liability where a retailer has a house brand? And do you see
5 if there is going to be any difference of perspective between
6 retailers that have house brands and those that don't, those
7 that manufacture, and those that don't? And is there the need
8 for liaison for retailers where they are manufacturing their
9 own house brands?

10 That was like a lot of questions. You can unpack it
11 in whatever order you want.

12 *MS. JOHNSTON:* Well, I think that this may be a group
13 answer, and it may be something that Mr. Pulaski needs to weigh
14 in on because he is going to have a firmer understanding of
15 what is going to come out in the Master Complaint. It may be
16 something that Mr. Barnes or Mr. Yoo need to weigh in on
17 because they are representing the generic manufacturers.

18 But at a top level, I am not aware of any retailer
19 either currently named or potentially to be named that actually
20 is the manufacturer of a store brand product, that is where the
21 generic manufacturers come in.

22 So, to the extent that there is a question of whether
23 there is an additional tier that is not being accounted for, I
24 don't think that that concern is at least one that has come to
25 bear yet. And with the generics, covering the generic

1 manufacturer and sold as a generic in a retailer setting, there
2 is adequate representation there.

3 Mr. Pulaski may have more about the actual liability
4 issues or contentions that would be raised against the
5 retailers, but I think in terms of whether there is a separate
6 manufacturing function, I don't think that is being alleged and
7 I am not aware that is actually something that is being
8 undertaken by the retailers.

9 MR. PULASKI: Judge, to my knowledge, I don't know of
10 any retailers who actually manufacture their own products.
11 Obviously, that is something that we will delve into in
12 discovery just to make sure that we are accurate in our
13 position. We have other issues with respect to retailers,
14 retailer liability in different states, and then the marketing
15 issues as they relate to the agreements between the retailers
16 and the generic manufacturers for the store brand products.

17 But to specifically answer your question, I am unaware
18 of any retailer that has its own generic brand of Zantac or
19 Ranitidine.

20 THE COURT: Okay. I saw Mr. Yoo. Did you want to add
21 to that conversation at all?

22 MR. YOO: I didn't, your Honor. I happen to represent
23 a prescription only generic manufacturer. I don't have an
24 understanding that is different from what Ms. Johnston and Mr.
25 Pulaski have expressed.

1 I actually just wanted to apologize for dropping off
2 so abruptly. My Zoom connection decided to buffer at the worst
3 possible time. I want to thank your Honor for your comments
4 earlier directed to me and the generics.

5 *THE COURT:* Terrific. All right. I will turn it back
6 over to you.

7 *MS. JOHNSTON:* If there are no more questions, I think
8 that up next is going to be a discussion of the census. I
9 think we go back to Mr. Pulaski.

10 *MR. McGLAMRY:* No, your Honor.

11 *MR. PULASKI:* We go to Mr. McGlamry.

12 *MR. McGLAMRY:* It is back to us on the status of the
13 proposed orders.

14 First, I want to correct, I misspoke earlier when we
15 were talking about the generics, and I think I referred to Mr.
16 Barnes as Mr. Brian. I just want to make sure that was
17 acknowledged.

18 And then secondly, despite Mr. Friedman's remarks
19 about the dogs barking, which I think was alluding to my two
20 old miniature Dachshunds, I am going to let him go first on the
21 orders.

22 *MR. FRIEDMAN:* Thank you, Mr. McGlamry. No effort was
23 made or intended to disparage your dogs. Ralph Friedman again
24 for the Defendants.

25 I am just going to review the specific orders that we

1 have all been working on fairly quickly and take any questions,
2 and Mr. McGlamry may have some comments to add on those and I
3 am happy to discuss any of them.

4 We have heard about the four orders that are important
5 to the start of discovery, preservation, confidentiality,
6 privilege, and the ESI protocol. As we have discussed, we are
7 working to get those finalized by June 1st, and we all remain
8 cautiously optimistic of doing that.

9 If we can't work out every detail, we'll report to the
10 Court as of June 1st, and as discussed, request a case
11 management conference in mid June to resolve any lingering
12 issues.

13 On that note, we have talked about the CMO that the
14 parties have already submitted regarding discovery procedures
15 and handling of discovery disputes. We addressed that earlier
16 today, so I don't think we need to go back into that.

17 Then there are two other orders that relate to
18 discovery that the parties are discussing. I just want to
19 mention one is an order regarding the authenticity of documents
20 produced by the parties. The second is an order regarding a
21 protocol for conducting depositions of Plaintiffs whose health
22 may necessitate preserving their testimony before their
23 depositions might be otherwise scheduled. Those are two other
24 discovery orders that we are working on currently.

25 Finally, there are two orders that don't have to do

1 really with discovery, that have to do with anticipated
2 pleadings. One, obviously, is an order on Master pleadings in
3 both the personal injury and class action cases, and that order
4 will set out a schedule not just for the filing of the Master
5 Complaints, which I think has been addressed yesterday, but
6 also for responsive pleadings for motions by the Defendants,
7 and also address the procedure for the Plaintiffs to file short
8 form Complaints after the Master Complaint is filed. So, that
9 is something we have been working on and continue to do so.

10 And then lastly, there is another order related to the
11 streamline service of process the Plaintiffs have proposed. It
12 is a fairly -- it is more technical or administrative. It
13 involves leveraging the LMI platform to allow Complaints to be
14 served on domestic Defendants a little more seamlessly. That
15 is something we look forward to discussing with the Plaintiffs,
16 too.

17 Again, for all these we are endeavoring to reach
18 agreement by June 1st, and that, really, is all I wanted to
19 mention, just kind of run through that for your Honors. Mr.
20 McGlamry may have some additional gloss to put on that and then
21 we are happy to address any questions that your Honors have.

22 *MR. McGLAMRY:* Yes, thanks. I really don't have a lot
23 to add to that. We are all working on all of those. As Mr.
24 Friedman indicated, we have sort of added to that June 1st date
25 in terms of the target date of getting not just the four orders

1 that we previously discussed yesterday and earlier today, but
2 also these additional ones that he has identified.

3 I wanted only really to reference the issue about
4 service and process, and ultimately this master pleadings order
5 and our Master Complaints.

6 In the context of, Judge Reinhart, what you mentioned
7 earlier about form over substance, and the discussion with the
8 retailers and the brands, is that I think part of what we have
9 all looked at in terms of trying to facilitate service and
10 process and getting people on board like Ms. Johnston is doing
11 for the retailers, Mr. Yoo and Mr. Barnes are doing for the
12 generics, and others, is that we want to encourage all of these
13 potential parties to go ahead and engage in this litigation.

14 Just like you said, Judge Reinhart, it is easier for
15 people to go ahead and get involved and be heard and have their
16 input in the case as opposed to waiting around for something to
17 happen later, then all of a sudden they're in and we have
18 already been hitting the ground running and halfway through our
19 18 months of discovery, and people are saying, well, you know,
20 I just got involved. I think what we are trying to do now is
21 give them all the opportunity to get involved now.

22 Essentially, other than that, Mr. Friedman is exactly
23 right, we are working on these. I have as much confidence in
24 the additional orders that he referenced as the first four, and
25 we will hopefully be able get those to you all as quickly as we

1 can. Thank you.

2 *THE COURT:* Thank you. Where do we go next on the
3 agenda?

4 *MR. McGLAMRY:* Your Honor, we are going to go to the
5 anticipated motions which will be Mr. Gilbert on our behalf. I
6 think he will lead it off, with Ms. Rydstrom on the Defense
7 side.

8 *MR. GILBERT:* Good morning, your Honor.

9 *THE COURT:* Good morning.

10 *MS. RYDSTROM:* Good morning, your Honor.

11 *MR. GILBERT:* I believe Ms. Rydstrom was going to lead
12 it off. I am happy to defer to her if she'd like and I'll
13 follow up.

14 *THE COURT:* For the record, that was Mr. Gilbert
15 speaking and now Ms. Rydstrom is going to speak, just for the
16 benefit of our court reporter.

17 *MR. GILBERT:* Thank you, Judge.

18 *MS. RYDSTROM:* Thank you, your Honors. Again, this is
19 Jessica Rydstrom for the Defendants.

20 For our part, I will just briefly outline the
21 categories of motions that Defendants anticipate filing in
22 calendar year 2020. I have the enormous good fortune of being
23 able to draft off of the legal presentations that came
24 yesterday, so hopefully none of these issues will come as any
25 enormous surprise to the Court.

1 I will say, of course, that the contours of these
2 motions will depend on the Master Complaints when we receive
3 them, and obviously the Defendants will review those Complaints
4 and tailor whatever motions they make to the allegations and
5 specific claims that are made in each. But broadly, I think
6 the motions that Defendants anticipate filing this year would
7 fall into three categories.

8 And the first are the personal jurisdiction motions,
9 and that would be, your Honor, on behalf of some of the branded
10 Defendants, and the issue there, of course, is that there is no
11 general or specific jurisdiction over foreign Defendants who
12 were never the NDA holders for Zantac and who did not
13 manufacture or sell or distribute the medicine in the United
14 States. So, those would be the personal jurisdiction motions.

15 Then, of course, you can see preemption motions. We
16 heard a lot about preemption yesterday in the legal
17 presentations, and I won't belabor those arguments except to
18 say that that motion would make arguments based on preemption
19 that is applicable to various Defendants in the case.

20 And then, of course, there might be Rule 12 arguments,
21 that will depend on the allegations in the Master Complaint,
22 and obviously, we have every intention, your Honors, of being
23 thoughtful and focused about the issues that we choose to
24 raise, but if there are, of course, legal issues that are
25 common to some or all of the Plaintiffs, or a significant

1 number of Plaintiffs, and we think that the litigation would
2 benefit from the early resolution of those issues, those may be
3 raised in that early motion.

4 Again, I say only that we will be thoughtful and
5 focused about the issues that we raise in any of these Rule 12
6 type motions, and I would imagine, of course, your Honors, that
7 they would encompass some of the other issues that you heard
8 from the legal group yesterday.

9 I think that is generally what we envision from our
10 perspective on the motions that will come up, or that we would
11 be bringing to the Court in this calendar year, and so, I
12 believe that Mr. Gilbert has some motions he wants to raise and
13 talk about to preview for the Court on behalf of Plaintiffs, so
14 I would turn it over to him.

15 *THE COURT:* I jut had a few followup questions, if I
16 could.

17 *MS. RYDSTROM:* Of course.

18 *THE COURT:* And it is with the understanding that you
19 haven't even seen the Complaint, so I get it, that is hard.
20 So, I am not holding you to anything in particular. I am just
21 trying to broadly understand.

22 So, with the personal jurisdiction motions on behalf
23 of some of the branded Defendants, would they be filed
24 together? Would you envision separate motions by separate
25 Defendants? Is it just impacting branded, not other potential

1 Defendants?

2 And I guess along with that, do you envision that the
3 kinds of discovery that has been discussed that preceded this
4 session covers the kind of information that the parties would
5 need to be able to fully put forth their position on the
6 personal jurisdiction issue, or are you envisioning there might
7 be additional discovery needs relating to a personal
8 jurisdiction motion? And if so, have you been working with the
9 group on discovery about that?

10 *MS. RYDSTROM:* I appreciate the question, your Honor,
11 and I will take them in order.

12 First, to the extent that it improves the efficiency,
13 this is certainly not a motion that all of the branded
14 Defendants would have. It is only certain of the Defendants
15 who would raise this particular issue, and I am thinking in
16 particular of some of the foreign affiliates of branded
17 Defendants, and this is off the top of my head, who might have
18 those issues that they would want to raise.

19 I don't know, candidly, your Honor, because that
20 doesn't affect my client, Pfizer, and I just don't know what
21 discussions the Plaintiffs have had about the potential for
22 discovery relating to any of those jurisdictional issues. And
23 I have every confidence, given the track record of success so
24 far, that once we see the Master Complaint and those Defendants
25 who would have those issues to raise have had a chance to look

1 at the allegations, particularly any jurisdictional
2 allegations, that those discussions can be had and we can meet
3 and confer with Plaintiffs about what, if anything, might be
4 needed on that front.

5 *THE COURT:* Okay. And then similarly with preemption
6 and motions to dismiss, do you envision that there would be
7 coordinated efforts, I guess where applicable and appropriate,
8 in filing such motions, or each Defendant is contemplating
9 filing its own motion, if there are overlapping issues? What
10 do you think might be an efficient way?

11 We are talking conceptually right now because you
12 haven't seen the Complaint, it is conceptually only.

13 *MS. RYDSTROM:* Sure. It is definitely not the
14 intention on the Defense side to flood the Court with 25
15 different motions that are essentially raising the same
16 arguments, but just in ever so slightly tweaked forms. We
17 don't think that is an efficient way to proceed. So, we will
18 do our best to coordinate that, your Honor.

19 We haven't had discussions about exactly what that
20 briefing would look like on our side, but I have no reason to
21 believe that we have any issue coordinating where there are
22 legal issues or, for example, on preemption that would apply
23 across various types of branded manufacturers or OTCs that we
24 would be able to coordinate that so we are presenting them to
25 the Court in as organized and concise a fashion as possible.

1 *THE COURT:* I know because you happen to be in this
2 session and you are probably unfairly getting hit with the
3 questions that maybe others could equally speak to, so I do
4 invite, if any of the other Defendants -- before we turn it
5 over to the Plaintiff side with Mr. Gilbert, if any of the
6 other Defendants wanted to come on the video, brands, retailer,
7 generics, you are certainly invited to do so.

8 And again, it is just a conceptual discussion at this
9 point, but as long as we are talking about motions, I would
10 love to hear what you might be thinking about right now, again,
11 understanding you haven't seen the Complaint.

12 *MR. AGNESHWAR:* Your Honor, this is Anand Agneshwar
13 representing Sanofi. Can I speak briefly to the jurisdictional
14 issue, because Sanofi is one of the entities that is affected
15 by that?

16 *THE COURT:* Sure.

17 *MR. AGNESHWAR:* So, Sanofi is based in the U.S., but
18 it has a parent company in France, obviously. The U.S.
19 Defendants are not going to be raising any personal
20 jurisdiction issues, but it is very likely that the French
21 entity will.

22 Typically what happens is that has to be by rule the
23 first motion that the foreign entity files in the case because
24 it is jurisdictional. Typically, after we file the motion and
25 put in what we believe is the record explaining why there is no

1 jurisdiction. The Plaintiffs look at that and determine
2 whether they think they need any discovery in order to test
3 what we are saying. Sometimes it is submitted on an undisputed
4 record, sometimes the Plaintiffs ask for a certain amount of
5 discovery and even depositions.

6 I imagine once we file that motion, we will have a
7 meet and confer with Mr. Gilbert and Mr. McGlamry, or whoever
8 they designate on their side to deal with that, and just like
9 everything else, hopefully we will agree, and if we can't, we
10 will tee up any disputes. That is how I see that at least as
11 against my client.

12 *THE COURT:* Thank you. Did anyone else want to speak
13 to personal jurisdiction? Then we can go to an of the other
14 Defense counsel and then we can go to the preemption issue
15 and/or motion to dismiss.

16 *MR. BARNES:* Your Honor, this is Richard Barnes on
17 behalf of the generics. I would echo what was presented by
18 Ms. Rydstrom for the generics. I think you will see
19 jurisdictional motions on behalf of some generic Defendants for
20 the reasons that Mr. Agneshwar mentioned. There are some
21 foreign entities that have been sued that will likely raise
22 jurisdictional challenges. And I think her statements on
23 preemption were accurate as to the generics.

24 We'll, obviously, carefully look at the Master
25 Complaints for additional 12(b) motions and we'll coordinate as

1 necessary amongst the brands and the generics to be as
2 efficient as possible.

3 *THE COURT:* Thank you, Mr. Barnes.

4 *MAGISTRATE JUDGE REINHART:* Mr. Barnes, can I ask you
5 a followup question, please?

6 *MR. BARNES:* Yes, sir. Good morning.

7 *MAGISTRATE JUDGE REINHART:* You just happen to be the
8 last person to speak so you get the question, but anyone else
9 can respond if they would like.

10 It is kind of a sequencing question because it seems
11 to me, and obviously not prejudging anything, but generally
12 speaking, a preemption motion is an affirmative defense that
13 really can't be often raised on a 12(b)(6) motion. Obviously
14 if the Complaint on its face would establish preemption it can
15 be raised. But if it doesn't, it has to be raised either on a
16 motion for judgment on the pleadings or later in the
17 litigation, at least that is my understanding of the law in the
18 Eleventh Circuit.

19 Assuming that is right, I am just trying to understand
20 how the sequencing would work. For example, if you have a
21 generic who first wants to file a personal jurisdiction motion,
22 assuming that doesn't succeed, then they are going to file an
23 answer, then they are going to file potentially a preemption
24 motion, or would the preemption motion come before the answer?

25 I am just trying to understand the timing of when we

1 might be getting answers versus motions. As I understood
2 personal jurisdiction as to the branded Defendants, obviously
3 that will come first, they will answer, but preemption is
4 really not an issue for them as I hear it.

5 If you have any comments or thoughts on that, I would
6 be interested to hear those.

7 *MR. BARNES:* Yes, I believe that preemption as to
8 Defendants is properly raised as a 12(b) motion and I would
9 cite your Honor to the case of Greger versus Pergo, (phon) the
10 Northern District of Illinois, October of 2019 case, where both
11 the generic and the retailer were dismissed on end of
12 preemption grounds and it was a comprehensive product liability
13 complaint common in pharmaceutical litigation. That case is
14 emblematic of how Defendants view the preemption motion and the
15 timing.

16 I think as to jurisdiction, what you will see is there
17 will be generic Defendants who will not raise personal
18 jurisdiction arguments as well and would look at it as a
19 pre-answer motion 12(b)(6) in any event.

20 I think the timing and sequencing should be worked out
21 and perhaps even the Plaintiff would consider dismissing some
22 foreign entities as not really appropriate to the litigation
23 here, so there could be some discussion as to who is the
24 operating company in the United States that should properly be
25 sued in this case.

1 So, I think our position would be both issues would be
2 raised as a threshold issue.

3 The only thing I would comment on, I think it was
4 stated yesterday that preemption is a threshold legal issue for
5 the Court and it is proper for early resolution.

6 *MAGISTRATE JUDGE REINHART:* Understood. Thank you.

7 *THE COURT:* On that issue, Mr. Barnes, you just said
8 maybe the Plaintiffs may see fit not to even name certain
9 foreign entities. I would wonder, if it hasn't happened
10 already, if that can be part of what the sharing of information
11 between Plaintiff and Defense is in these days leading up to
12 the filing of the Master Complaint, which I think, Mr. Gilbert,
13 you said was probably going to be around June 22nd. I think I
14 had a note of that.

15 So, it would seem that, you know, that would be a
16 productive discussion to have to learn more about some of the
17 foreign entities and if the Defendants, I assume, would be
18 willing to share that information, so, if you ultimately decide
19 to name them, you are certain you believe the Court has
20 jurisdiction over them.

21 It just saves a step of motion practice if it is self
22 evident from certain documents, but sometimes they are not.
23 So, I'd just followup on what Mr. Barnes -- you know, your
24 point about that.

25 *MR. BARNES:* I think the Defense would be welcome to

1 discussions so as not to bother the Court on issues that are, I
2 think, perhaps not controversial as to some foreign Defendants.

3 *THE COURT:* Right, it could be as to some, but not
4 all.

5 Anybody else want to be heard?

6 *MR. SACHSE:* Your Honor, this is Will Sachse on behalf
7 of GlaxoSmithKline. I just want to kind of piggy-back on the
8 discussion we have been having. GSK is similarly situated to
9 Sanofi in that there is GSK PLC, which is a U.K. entity named
10 in some, but not all of these lawsuits, and then there's GSK
11 LLC, which is the U.S. entity. I think much as Anand was
12 suggesting we proceed on jurisdiction as to Sanofi, the same
13 thing would be true for GSK.

14 I do like your Honor's suggestion. We haven't seen
15 the Complaint yet, obviously, but we may be able to sort of
16 sidestep some of this motion practice by agreement with the
17 Plaintiffs, so I think we'll definitely take that up.

18 One other jurisdictional issue I did want to mention,
19 the U.S. GSK entity may be raising personal jurisdiction
20 case -- defenses in those cases where the Plaintiffs are
21 pursuing what they term the innovator liability theory, and
22 again, I think we need to see the Complaints to see how that
23 all comes out, but I just wanted to put that on the record and
24 put that on your map that that might be an early motion that
25 you see from GSK.

1 *THE COURT:* Okay, thank you.

2 Okay. You had some help, Ms. Rydstrom.

3 *MS. RYDSTROM:* I'll never turn it down, your Honor.

4 *THE COURT:* Took a little bit of heat off of you.

5 Ms. Johnston, did you have something to add as well?

6 *MS. JOHNSTON:* Yes, just briefly, your Honor. I just
7 wanted to touch on one issue that is specific to the retailers
8 because it is one that wasn't raised yesterday.

9 I think that for the retailers, we contemplate --
10 based on what shakes out in the Master Complaint, but we would
11 anticipate a Rule 12 motion on the issue of innocent seller to
12 the extent that there are states that afford that defense
13 either by statute or under some specific product liability
14 scheme. So, that would be a retailer specific defense that we
15 intend to raise at the motion to dismiss stage.

16 *THE COURT:* All right. With that, feel free, Mr.
17 Gilbert, to call upon help as well if you need it on the
18 Plaintiffs' side.

19 *MR. AGNESHWAR:* Your Honor, can I just jump in one
20 more time? I'm sorry about that.

21 *THE COURT:* Yes. That's okay. You are feeling so
22 confident with Zoom now that you just want to make sure you
23 fully utilize the session.

24 *MR. AGNESHWAR:* Exactly, just two seconds.

25 *THE COURT:* Sure.

1 MR. AGNESHWAR: Preemption is also going to be an
2 issue for the branded companies, and to respond to Judge
3 Reinhart's question at least as to Sanofi's foreign entity, as
4 to how that will be dealt with, the Defendants that are
5 properly served in this case will be making their motions and
6 the preemption analysis generally will be the same or similar
7 as to all Defendants.

8 So, even though the foreign entity won't be joining
9 that motion until it is determined that it is properly served,
10 I am sure at that point there will be a ruling that everyone
11 will look at and make a judgment as to whether to file a
12 subsequent motion that basically repeats what has already been
13 ruled on.

14 THE COURT: Okay. I will just say that, you know, in
15 other cases, non-MDL cases where we have multiple Defendants,
16 we have sometimes seen it work well where the issues are
17 aligned that there are joint motions, and I can tell you that I
18 have been lenient in expanding the page limit that our local
19 rules otherwise impose upon you, just so you know you don't
20 have to squeeze everything into the page limit if multiple
21 Defendants are joining in submitting joint motions, and
22 sometimes even larger periods of time to respond because maybe
23 the motion is longer, because as you know, our local rules,
24 which everyone should, if you are not already familiar, become
25 familiar, they are posted online and very accessible, not

1 unlike other jurisdictions where you practice, just be familiar
2 with those. That is for all counsel involved in this case.

3 Okay, Mr. Gilbert. Did I hear you say no motions for
4 the Plaintiff?

5 *MR. GILBERT:* Almost no motions, but after hearing all
6 these great reports from Defense counsel, ten of them almost I
7 counted, let me address a couple of things first.

8 First, off the subject of motions, let me say, Judge,
9 you mentioned at the beginning of this morning's conference
10 potentially Zoom setting the new standard for meet and confers,
11 and I am sure there was some degree of seriousness in your
12 comment. I can tell you from the Plaintiffs' standpoint, and I
13 would be certain that my Defense colleagues involved in this
14 case would agree, it really has set a new standard for us, and
15 it is something that we should really discuss in the context of
16 our local rules, expanding our local rules.

17 People who don't want to pay for a Zoom subscription
18 have no excuse because it is free up to 40 minutes and a
19 limited number of participants. Firms like many of ours have a
20 larger subscription. There is really no excuse for not having
21 a face-to-face conversation, because the transparency that
22 comes when people look each other in the eye and have a
23 conversation about why we disagree narrows those differences
24 considerably because people are much quicker to hit send on a
25 text or email and say things that they won't say in a Zoom

1 conversation, and that can facilitate resolution of disputes,
2 discovery disputes, resolution of lots of disputes consistent
3 with Rule 1 of the Federal Rules and I think we should really
4 consider exploring it as a best practice for our district and
5 the local rules.

6 Also, Judge Reinhart, it is a pleasure to meet you
7 this morning for the first time. I noted your comment about
8 the NextGen, which we saw from your standard operating
9 procedure on the discovery dispute resolution order, and it
10 fits so nicely, like a glove really, consistent with Judge
11 Rosenberg's creation of the Leadership Development Committee,
12 and I am sure that even had you not said that, we would be
13 pursuing that on our side and I am sure the Defendants would as
14 well. So, thank you both for those comments.

15 Before I go to the three motions I want to talk about
16 from the Plaintiffs' side, I would like to briefly respond to
17 the issues that you asked questions about from the Defendants
18 with regard to initial motion practice, if I may. Is that okay
19 with you, your Honor?

20 *THE COURT:* Sure.

21 *MR. GILBERT:* Okay. First of all, let me on behalf of
22 our side reassure the Court that we do not intend to name any
23 Defendant, domestic or foreign, that we don't think has a good
24 basis for being included in the Master Complaint. That goes
25 without saying.

1 Sometimes there are reasons for naming foreign
2 Defendants even when there is a U.S. domestic company that is
3 involved in the day-to-day operational side of a business,
4 whether it is a drug case or a bank case or whatever.

5 We are making those analyses now as we go through the
6 process of putting together our Master Complaints. I am
7 delighted on behalf of our team to take up the offer from Mr.
8 Barnes and others on the Defense side to have some
9 conversations before filing where they involve foreign
10 Defendants and to discuss whether or not we believe we need to
11 include them and why, and to see whether we can narrow the
12 scope to avoid unnecessary motion practice, whether it is a
13 personal jurisdiction motion or otherwise.

14 Um-m-m, I think it was Mr. Agneshwar who said on the
15 personal jurisdiction motions, and I agree with him, most times
16 it will be the movant who raises personal jurisdiction
17 accompanied by an affidavit, and we in turn would then respond
18 to them and tell them what kind of personal jurisdictional
19 discovery we think we need in order to adequately respond to
20 that motion, if indeed we decide we want to respond to the
21 motion.

22 Often times you see these personal jurisdiction
23 motions resolved by some stipulation or agreement, it gets rid
24 of the Defendant without prejudice based on some sort of
25 agreement. Sometimes you don't.

1 That type of discovery currently is not part of what
2 we have asked the brand manufacturers or the generic
3 manufacturers for because it is really not what I consider to
4 be merits discovery. It will come up in the course of
5 discussion either before the filing or after the filing if they
6 raise those motions.

7 With regard to your question, Judge Rosenberg, about
8 the more substantive -- no disrespect to personal jurisdiction,
9 but the more substantive 12(b) motions, preemption and others,
10 I expect that we will engage, Mr. McGlamry and I, with Mr.
11 Agneshwar and Mr. Petrosinelli and perhaps others over the
12 course of the next two weeks as part of our case scheduling
13 order discussions in some discussion about how to consolidate
14 responsive motions to the Master Complaints.

15 There are a lot of ways it can be done. I remember in
16 the overdraft MDL, when we started with that ten years ago, by
17 agreement and with a little prodding from the Court, five of
18 the largest banks in the world combined their efforts and filed
19 an omnibus motion to dismiss targeted against the Master
20 Complaint. I think preemption might have even been their
21 seminal issue in that 12(b) motion.

22 And Judge King afforded each of those five or six
23 banks the opportunity to supplement that omnibus motion with
24 like a five-page additional motion of their own on specific
25 issues outside of the combined issues that they felt they

1 needed to raise, and then the Plaintiffs, in turn, were able to
2 file a single omnibus consolidated response to that motion
3 along with five pages that responded to the individual issues,
4 if you will.

5 That may be the vehicle that we use here. We are
6 going to have two or three Master Complaints, one for the
7 personal injury track, one for the consumer economic loss and
8 medical monitoring, and one for the third party payor. Those
9 last two I mentioned are the class complaints and the first one
10 is on the personal injury side, so we might find ourselves
11 having three omnibus motions or some other vehicle.

12 But I would suggest right now that that is best left,
13 if it is okay with the Court, to us to discuss internally with
14 our colleagues on the other side to see if we can come up with
15 an agreement that we think -- that works for both sides, and
16 then present it to the Court to see if it works for the Court.

17 *THE COURT:* Absolutely.

18 *MR. GILBERT:* Great. So, nothing else about what my
19 colleagues on the Defense said this morning comes as a surprise
20 or unexpected.

21 From our perspective, there are three motions that I
22 think are likely to come up, all of which I previewed with
23 Ms. Rydstrom in advance of today, two of which were mentioned
24 in our April 30th joint letter to the Court, one of which we
25 overlooked and I apologize for that. I am going to take that

1 one first because it is really a let's get started motion.

2 We anticipate, once we finalize the identity of the
3 Defendants who are going to be named in the Master Complaints,
4 that some of them will be obviously, as we have been
5 discussing, foreign Defendants, overseas Defendants, and some
6 of those Defendants are in countries like the U.K. that make
7 foreign service relatively easy and not cumbersome, and some of
8 them are in countries where the Hague Convention makes service
9 quite cumbersome, difficult, prolonged and can slow litigation
10 down a great bit.

11 There is an alternative to that for many of these
12 countries provided under Rule 4(f)(3), F as in Frank, 3, it's
13 Rule 4(f)(3) of the Federal Rules, and that is alternative
14 service by alternative means rather than going through the
15 Hague Convention. It is something that is allowed for certain
16 countries, and something not permitted for others, and it
17 really depends on specifically which countries those foreign
18 countries are based in, and what they have said in their
19 official remarks and comments, I think is the word, in
20 accepting the Hague Convention.

21 I personally used this mechanism before in other
22 cases, including recently in a case that is pending before
23 Judge Altonaga, the Salmon (phon) antitrust case with regard to
24 some Norwegian Defendants.

25 In short, I think of the first motions, in fact the

1 very first motion that the Court should anticipate seeing from
2 our side, as soon as we identify the foreign Defendants that we
3 intend to include in the Master Personal Injury and Master
4 Class Complaints is a motion to allow alternative service
5 pursuant to Rule 4(f)(3), as to those foreign Defendants in
6 countries that we believe the law provides for us to
7 exercise -- the Court to exercise its discretion under Rule
8 4(f) to allow for alternative service.

9 That is the first motion.

10 The second and third motions were referenced in our
11 April 30th joint letter. One of them is a motion for
12 procedures for obtaining customer loyalty program data from
13 retail pharmacies, wholesalers, and potentially third parties.
14 We are sensitive on our side to the point made wisely by Judge
15 Reinhart about third parties having rights when they are
16 outside of this district, and we are going to consider that
17 internally and discuss it, about how we might be able to
18 approach it.

19 We are also, as Mr. Pulaski and Ms. Johnston reported
20 to the Court, engaged in ongoing discussions with the retail
21 pharmacies, retailers, so to speak, that may either eliminate
22 the need or narrow the scope of this type of motion with regard
23 to retailers, and perhaps with regard to wholesalers as well.
24 That is the second motion we anticipate bringing sometime this
25 year if necessary.

1 The third motion is really a motion that may or may
2 not arise this year, really dependent on how the responses come
3 based on FOIA requests, and that is a motion regarding
4 procedures for obtaining documents and data from Government
5 agencies, whether it's the FDA, DOJ, Health and Human Services,
6 or the National Institute of Health, to name four by way of
7 illustration only.

8 Obviously, your Honors are probably even more aware
9 than I of all of the detailed administrative rules that address
10 obtaining data and documents from foreign -- not from foreign,
11 from Government agencies. We will be needing to obtain the
12 data and documents from certain Government agencies, some
13 sooner rather than later, and we will make sure that we address
14 the proper procedure for doing so, and if we have exercised and
15 utilized unsuccessfully whatever process, administrative
16 process is afforded to us in order to try and get that
17 information, would then resort to bringing some sort of motion
18 before the Court to try to have that issue teed up.

19 Those are the three types of motions I see -- we see
20 coming down the pike during the balance of 2020 from the
21 Plaintiffs' side. Obviously, I left off the issue of discovery
22 related motions because, number one, we are all hopeful that
23 those will be minimal; but number two, knowing that inevitably
24 there will be some discovery motion practice, that hopefully
25 will be able to be resolved through Judge Reinhart's order,

1 streamlined discovery resolution procedure order.

2 If it is not, then with Judge Reinhardt's permission,
3 after hearing that dispute, he may or may not give permission
4 for the filing of the motion.

5 *THE COURT:* Have FOIA requests been made yet to any of
6 the agencies you just mentioned?

7 *MR. GILBERT:* It is my understanding that some FOIA
8 requests have already gone out. I can't tell you which
9 agencies have received them and how many of them have gone out,
10 but I am aware that some have gone out already. I could give
11 the Court a more detailed report in short order if you would
12 like one.

13 *THE COURT:* Okay, that is fine.

14 If you get the documents through FOIA, do you envision
15 also needing to get them through formal rules of discovery?

16 *MR. GILBERT:* One would hope not. I think it really
17 depends on whether there are any limitations placed in the FOIA
18 responses on the scope of what was produced. If there are
19 significant restrictions placed for whatever reason and we
20 can't resolve those disputes with the respective Government
21 agencies, we might need to come in with respect to the
22 documents that that agency has refused to produce.

23 And obviously, this also takes into consideration --
24 or at least, I am thinking down the road, that after we get
25 documents, there may be certain Government agencies where we

1 need to take depositions and the exercise may then follow on
2 about how those depositions are taken if there is an agreement
3 reached between us and that particular Government agency with
4 regard to the named witness.

5 *THE COURT:* On the motion to allow alternative
6 service, is that an area that also lends itself to discussing
7 with the Defendants first before those motions are filed to see
8 whether there can be some agreement on acceptance of service on
9 some of these foreign entities?

10 *MR. GILBERT:* Absolutely. If any of the entities -- I
11 am going to use Mr. Agneshwar as an example only because he
12 appeared just a moment ago and so his face is fresh in my mind.

13 He has two clients that we were talking about this
14 morning, one is a U.S. based and the other I believe is based
15 in France. We would certainly engage with Mr. Agneshwar to
16 discuss asking him to ask his French client to allow him and
17 his U.S. client to accept service and try to convince them that
18 even if they don't, if France is where they are based, Sanofi,
19 the foreign entity, is based, that we can make a showing under
20 Rule 4(f)(3) that would allow us to ask the Court to exercise
21 its discretion to allow alternative service, assuming France,
22 for example, is the country and its response to the Hague
23 treaty allowed for it.

24 We would only seek the Court's intervention if, in the
25 example I gave, Mr. Agneshwar's client said no.

1 There are other situations, and I refer specifically
2 to the APIs that were referenced yesterday, the active
3 pharmaceutical ingredient Defendants, to my knowledge, none of
4 them are currently named in any of our pending Complaints.
5 Therefore, to my knowledge, none of them are represented by
6 counsel who appeared already to date, so we might not know who
7 to speak to.

8 However, some of them might be represented by U.S.
9 counsel in other litigations that are pending across the
10 country, for example, in the Valsartan litigation. If we find
11 a common API Defendant that is named in Valsartan that we
12 intend to name here, I pledge to the Court that we would reach
13 out to that Defense counsel and say they are being named in the
14 Zantac MDL, and we would like you to consider agreeing to
15 alternative service under Rule 4(f)(3), or accepting service,
16 even better yet, before we have to bring that motion to the
17 Court.

18 So, if we know that there is someone to speak to, I
19 assure the Court that we will make our effort, best effort to
20 speak to whoever we can to avoid unnecessary motion practice on
21 this issue.

22 *THE COURT:* Okay. Then likewise, when you are
23 discussing creative ideas for joint filing of motions where
24 issues overlap, let's say for the Defendants' motion, you will
25 include in that, you know, sort of page limit discussions, the

1 supplement issues as you had your experience with the prior
2 MDL, and I would also say time limits as well. We have our
3 local rules for response and reply. The default would be that
4 the local rules apply, and those response and reply times would
5 kick in.

6 I do understand that the motions get bigger, the
7 time -- the length of the response may need to get a little
8 bigger, and then the time to file the response.

9 So, balancing the need to take on larger amounts of
10 work in these kinds of motions than sort of the everyday
11 non-MDL case, but recognizing that the local rules are there
12 for a reason, and kind of trying to keep kind of a finite
13 briefing schedule, if you will, because the Court really can't
14 do anything until a motion is ripe, and as soon as the motion
15 is ripe, the Court wants to get on it to get a ruling for you
16 with or without a hearing.

17 I'd invite you as well to let the Court know if there
18 are particular motions you think lend themselves well to
19 hearing. Sometimes the Court calls motions up for hearings
20 just because it wants to. There are reasons behind the scenes
21 that the Court has for why it wants to have a hearing, but I
22 always invite the parties to let the Court know if there is a
23 particular reason why you think a hearing would be helpful.

24 Our goal would be to, as soon as motions are ripe, to
25 start working on them. We can't do that -- we can work on

1 them, but we really can't fully work on them and embrace all of
2 the issues until it is ripe, motion, response, reply.

3 I am not fond of motions for surreply and things of
4 that nature. In certain instances it is called for and I allow
5 it, and it actually saved the day. It was critical to have
6 that added piece of information, but then I always give the
7 other side a chance to respond. I am not fond of just sort of
8 notice of filing supplemental cases and this and that because I
9 think it is unfair to the other side. There is a sequence,
10 motion, response, reply. We should try to stick to it
11 certainly on the front end so it doesn't set bad practices as
12 we go along.

13 If you feel that certain motions lend themselves, a
14 new study, a new case, something came out, of course. My goal,
15 our goal is to be as educated and informed, know about every
16 case, every fact, and every legal issue we need to know about
17 to make the ruling within the confines of sort of a reasonable
18 process, which is what our local rules and Federal rules are
19 designed to accomplish. Always keep that in mind when you are
20 talking and negotiating and presenting it to the Court.

21 Otherwise, I am going to assume it is a motion and I
22 will calendar when the response date is based on the local rule
23 and calendar when the reply date is. If it is not there, you
24 can be sure the very next day an order is going to go out to
25 show cause why the motion shouldn't be granted for failure to

1 respond because the local rule provides that it can be granted
2 by default if you haven't responded other than a motion for
3 summary judgment.

4 I know you are familiar -- I am sure everyone is
5 familiar, but Mr. Gilbert, as a practitioner in the district,
6 you know.

7 *MR. GILBERT:* We appreciate your comments, Judge.
8 First of all, yes, we intended and still intend as part of the
9 conversations that we discussed yesterday on what I will call
10 the master case scheduling order to take us from day one up
11 through the general causation, Daubert, and class certification
12 hearings.

13 I anticipate that we will submit a very detailed
14 proposed order to the Court that provides for not only the
15 dates and deadlines for the filing of various motions, but for
16 oppositions and replies as well.

17 As you previewed in your comment, it won't come as any
18 surprise to the Court that on some of these very significant
19 substantive motions to both sides that the time limitations and
20 the page limitations for the motions themselves, the
21 oppositions, and the replies we are going to suggest be
22 altered.

23 There will be situations where the Defense needs it
24 for their motions and there will be situations where the
25 Plaintiffs need it for our motions and for our respective

1 oppositions and replies. We have all been through other
2 marathons, to use a word that is flowing a lot in this MDL
3 already, and I am certain that our experiences, our respected
4 experiences in these other marathons will be helpful in
5 reaching internal agreement between both sides on what those
6 page limits and proposed deadlines would be and we hope they
7 will be acceptable to the Court as well.

8 *THE COURT:* Yes. And so, in the case management
9 proposed order to come, the furthest date out you have
10 indicated from yesterday is the 18 months out for motions for
11 Daubert and for class certification as well.

12 *MR. GILBERT:* Yes, actually -- yes. Plus, what I
13 anticipate we will have with -- it will be slightly beyond 18
14 months because what we will have beyond the 18 months will be
15 the opposition to those respective motions and the replies to
16 those respective motions.

17 *THE COURT:* The filing of the motion 18 months out
18 from -- you said from when discovery starts, which I think you
19 said you are hoping for June 1st.

20 *MR. GILBERT:* We are targeting June 1st, but we are
21 certain that it is either going to be June 1st, or sometime in
22 June if we have to come to Court to have the Court resolve any
23 of the foundational structural orders, as Judge Reinhart
24 eloquently referred to them earlier.

25 *THE COURT:* I'm sure you have thought of it and you

1 know this, but I would ask in your proposed order, just like
2 when I put my pretrial orders together, I always think in terms
3 of there is the summary judgment stage, everything that happens
4 before, and then, of course, those things that happen
5 afterwards.

6 And so, thinking in terms of when you
7 envision certain -- everything you need for Daubert, not only
8 what you need, but what you need rulings on, so you are
9 building into that the time frame for the ripening of the
10 motion, the motion, the response, the reply, you are building
11 in, of course, the time the Court is going to need to rule on
12 the motions, and you know what you need from the Court to file
13 your class certification and your Daubert motions.

14 I am assuming, but maybe I could be wrong, that you
15 would want and need rulings on some of these Defense motions
16 that we heard about today. I would think the personal
17 jurisdiction, if any are going to be filled, preemption and
18 motions to dismiss, I wouldn't think Defendants want to go into
19 Daubert motions and class cert motions necessarily without
20 having rulings on that, but maybe you can tell me differently.

21 If that is the case, then I want to make sure that
22 enough time is built into this whole case management schedule
23 up to the 18-month mark where you have the discovery, you need
24 to file the motions, the motions are ripe within a time period,
25 I have the time to issue a ruling, and then there is enough

1 time so you know whether you are filing your class cert motion
2 and/or your Daubert motion.

3 Does that make sense?

4 *MS. RYDSTROM:* That does for me, your Honor, and we
5 will take that absolutely under advisement. I do believe that,
6 yes, Defendants would want some of those issues resolved before
7 we move further along in the case, so we will be cognizant of
8 that.

9 I know Mr. Gilbert and Mr. Petrosinelli and Mr.
10 McGlamry and Mr. Agneshwar have been having discussions about
11 the schedule and I share Mr. Gilbert's confidence that we will
12 be able to give you a relatively detailed proposal that will
13 build in time for all of those particular events to happen as
14 we move forward over the next 18 months of the case.

15 *THE COURT:* Okay. I am confident it can be done. I
16 just want to make sure my understanding was correct in that if
17 you are putting the proposed case management order together,
18 which I always like the parties to do -- even in non-MDLs, I
19 invite that. I have a model on the website or -- yes, I think
20 on my website. A lot of the lawyers know that now and they
21 follow that. They can see, at a minimum, the ripening of the
22 motion for summary judgment has to be a certain number of
23 months before, let's say, trial.

24 I don't want parties in a position of having to expend
25 resources unnecessarily preparing for something that they may

1 not have to prepare for if the motion disposes of a certain
2 issue. So, I know I am always really remindful of that.

3 Admittedly, I am on less solid ground -- not
4 necessarily less solid, but less familiar ground with the MDLs.
5 I will use the same experiences I have had in my non-MDL cases,
6 but I wanted you to know these are things I think about when I
7 look at a case management order, make sure there is enough
8 built in time for me to do what I need to do. I don't mean
9 doing it at the last minute, I mean doing it so that you have
10 enough time to know what you are doing next. We will work hard
11 and when the motions are ripe, I don't see why that wouldn't be
12 the first thing that chambers will turn its attention to.

13 That is another reason why sticking to the schedule
14 would be great for your benefit as well because during the
15 COVID period things have dropped off a little bit. Certainly
16 criminal filings are down, and that will pick up at some point.
17 So, you really do have the undivided attention of the Court,
18 Judge Reinhart and myself, and you will continue to throughout
19 the course of the litigation, but you particularly have it now.
20 This is a good way to begin.

21 *MR. GILBERT:* Your Honor, may I briefly respond?

22 *THE COURT:* Yes.

23 *MR. GILBERT:* We heard what the Court said. We will
24 build these types of things into the proposed scheduling order.
25 They are already in a framework that we've shared with Mr.

1 Agneshwar and Mr. Petrosinelli and I am confident that we will
2 be able to do that.

3 I will say that I was delighted to hear the
4 announcement by my colleague, Mr. McGlamry, and by Mr. Yoo
5 earlier today about the conversations that were had last night.
6 I can tell the Court that I was not part of them because I took
7 an early exit and put my head on the pillow, but key to --
8 relative to what we are discussing right now, what I think is
9 very important to note is that while a personal jurisdiction
10 motion by a foreign Defendant, or for that matter even a U.S.
11 domestic Defendant, might stand in the way temporarily for
12 their active participation in the merits of the case, our
13 agreement in principle that we announced yesterday to move
14 forward with discovery over an 18-month period leading up to
15 the filing of the general causation motions and Daubert, as
16 well as the class certification motions, takes into account any
17 preemption motions or other 12(b) motions that might be filed
18 at the starting gate by the Defendants is not, and I underline
19 the word not, going to stop the discovery process with regard
20 to them and us.

21 So, the Court should feel while they are important to
22 get them resolved sooner rather than later, the discovery is
23 going to move forward as against the Defendants, and I only
24 accepted personal jurisdiction there because it is a unique
25 creature, and these Defendants are going to be expected to

1 produce everything that they are asked for unless they raise an
2 appropriate objection to that discovery based on the rules of
3 discovery.

4 So, we have an 18-month period of time to accomplish
5 our task leading up to the filing of these very important
6 motions, and whether the Court rules on the 12(b) preemption
7 motion a month after it is fully briefed and argued or it takes
8 the Court three months to write an opinion should not delay the
9 discovery in any way, shape, or form.

10 *THE COURT:* I couldn't agree more.

11 I made my point earlier about the Court doesn't, you
12 know, generally -- isn't generally favorably disposed to
13 staying discovery and doesn't see that it helps the case, and
14 certainly not in this case. So, don't construe my comments as
15 intending in any way to suggest something other than what the
16 agreement has been reached between the parties because the
17 Court fully endorses that agreement because it is aligned with
18 how the Court generally thinks about litigation.

19 I always want to mention the caveat that I treat every
20 case separately, and everyone always can be heard on any issue.
21 But it is aligned with my experience as to what works best in
22 litigation.

23 It was really more from the standpoint of putting
24 yourselves in the Judge's shoes and thinking in terms of when
25 motions ripen, you know, the Court needs time to rule on the

1 motions, and that, you know, to the extent that I can get you
2 rulings that help you just keep the case moving along divorced
3 from -- separate from the track that you are on in discovery,
4 because you are doing the discovery, and I will be here waiting
5 for the motions to be ripe -- ripen to give you expedient
6 rulings, and quality rulings, and thoughtful rulings, and
7 informed rulings because I know I will get great briefings that
8 will educate me on the issues.

9 MR. GILBERT: Thank you. We will.

10 THE COURT: Let's see. Do we want to talk anything
11 more about motions or do we want to go into initial census?

12 MS. RYDSTROM: Nothing further from us, your Honor.

13 MR. GILBERT: Nothing further from us either, your
14 Honor.

15 THE COURT: Terrific. Excuse me one minute.

16 With that, I think it would be helpful to have just a
17 little break. Pauline has been working very, very hard.
18 Actually, we all have as well. Why don't we take a -- why
19 don't we just take a 15-minute break and stick with the
20 schedule. So, at 11:45 we will have the report on initial
21 census.

22 Does that work with everybody?

23 MR. GILBERT: Sure, of course, your Honor.

24 THE COURT: Don't leave the meeting, just mute
25 yourselves and we will see you back at 11:45.

1 *(Thereupon, a short recess was taken.)*

2 THE COURT: Okay, welcome back, everyone.

3 Before we move into the final, or second to last final
4 session on our agenda, the report on initial census, I just
5 want to kind of do some concluding remarks on the motions that
6 we just heard about, now that I had a chance to review all of
7 my notes. I thought that was a very interesting session, and
8 certainly I learned a lot.

9 I want to thank Plaintiffs and Defense for trying to
10 preview the motions you think you will be filing. I know it is
11 hard on the Defense side when you haven't seen the Master
12 Complaint, but I appreciate you previewing the jurisdictional
13 motions, defense preemption motions from brand, generic, and
14 retailer, some 12(b)(6) motions.

15 I like the idea that the parties seem to be thinking
16 creatively about how the motions can be filed by all of the
17 parties that are going to be filing, creatively and
18 efficiently, whether it is the brands joining in and filing any
19 defense preemption, and retailers filing them together, and
20 generic, or whatever other ways you come up with that lead to
21 efficiency and putting the Court in a position to be able to
22 expeditiously rule.

23 I do like the fact that you have told me those are
24 2020 motions, so I find that very reasonable, and likewise
25 coming off of yesterday, find it very reasonable that the

1 18-month time frame for Daubert is what everyone has agreed to.

2 I think you are right on the mark. It is consistent
3 with how I was thinking about the case, so you are making my
4 job very easy, and once again applaud the parties working
5 together on the discovery, that all the discovery is moving
6 forward and the parties will continue to try to work issues out
7 and come to the Court when you need us.

8 I just wanted to make those concluding remarks from
9 the preceding session before we took our break.

10 Without further ado, can I turn it over to those who
11 will be presenting on the report on the initial census.

12 *MR. PULASKI:* Hello again. Your Honor, Adam Pulaski
13 again for the Plaintiffs on this topic and Ms. Cohan will be
14 speaking on behalf of the Defendants.

15 I would like to be able to discuss the initial census
16 also in general and then as relates to the mechanics of the
17 registry, the census plus that will be upcoming, and a
18 discussion of the registry process going forward, if that is
19 okay with you.

20 *THE COURT:* Sure.

21 *MR. PULASKI:* Okay. To start, your Honor, Judge
22 Reinhart, Special Master Dodge, welcome back. I want to just
23 quickly say that this truly was a group effort in every sense
24 of the meaning of that phrase.

25 I know we had an inordinate amount of input from this

1 Court through Special Master Dodge that, through Special Master
2 Dodge's foresight and hard work, which were instrumental in
3 this process, and her mediation skills that were used between
4 our side and the Defense were truly tested and put to good use.

5 I specifically want to thank Mr. Petrosinelli, Mr.
6 Cheffo, Ms. Sharpe, Mr. Bayman who initially started working
7 with us on this project, and then truly the rest of their
8 entire Defense team, including Ms. Cohan whose collaboration
9 and give and take and ability to compromise allowed for this to
10 occur, and then the work of our initial census team, but that
11 soon morphed into the entire April deliverables team, and our
12 entire group of 13, including Frank Maderal, and then finally
13 the vendors that are involved, which are LMI, Lexitas, and
14 Cerner, who have also worked day and night with us to get
15 everything into shape.

16 I am proud of the work everybody did, I am proud of
17 the collaboration, and certainly now I can see what can occur
18 if everybody puts their mind to it.

19 With that said, I will kind of get started. I want to
20 thank you first for the trust you placed in our initial census
21 team to work with the Defense counsel and Special Master Dodge
22 in an effort to create what is an unorthodox and novel approach
23 to the MDL litigation process that I truly believe, in some
24 form or fashion, should become a blueprint for all future MDLs.

25 I know this registry program is part of your vision

1 and certainly part of Special Master Dodge's vision, but I want
2 you to know that it is part of our vision, part of the
3 Defense's vision, part of many on the Plaintiffs' Bar, a large
4 number, and I know a vision of many on the rules committee as
5 well.

6 This initiative is more of a movement to streamline
7 the MDL litigation process in ways that aren't always apparent,
8 but are nonetheless present. In the end, the particular census
9 registry will also clear a path to take us from this point to
10 resolution regardless of the outcome in the most efficient and
11 cost effective manner that there is.

12 Following the direction of your Honor and this Court,
13 and just as discussed, Special Master Dodge, eight attorneys,
14 four from each side, began collaborating and crafting this
15 registry program that would consist of a registry, an initial
16 census, and a census plus form, which we initially called a
17 plan profile sheet.

18 Slowly the conversation then turned and migrated to
19 the possibility of a tolling agreement, a shared records
20 retrieval process, which would not only include the sharing of
21 records, but also include the sharing of costs, and eventually
22 a small estates order allowing for easy access to records and
23 data to be submitted to the registry.

24 Last month, the initial census was due for those that
25 applied for leadership and those that have already filed cases

1 in this MDL. There were many submissions, as you know, that
2 provided us with a robust sized sample pool from which to
3 gather information. This early stage data provided our side
4 and the Defense side with detailed data regarding types of
5 claims, average length of use, over-the-counter versus
6 prescription data and data related to start dates and stop
7 dates. The data proved useful and that was evident in how it
8 shaped some of the presentations that your Honors saw
9 yesterday. Hopefully your Honor and Special Master Dodge were
10 also able to use the data for leadership evaluation and
11 selection and for the Court's other purposes.

12 The process of submitting the initial census forms
13 also allowed us to work out a few kinks with the repository and
14 will allow for a smoother transition for census plus forms.
15 The census plus forms are more robust, over five pages long,
16 contain over 50 questions covering multiple topics, and these
17 forms will be submitted on a quarterly basis, with the first
18 submission due no later than some 60 plus days from now, after
19 your Honor's extension.

20 The process provides for more than just empirical
21 data. The process will allow us to analyze the entire
22 litigation on a rolling basis and give the Plaintiffs,
23 Defendants, and your Honors transparency into every aspect of
24 this litigation.

25 We will gather this information at an early stage,

1 instead of two years from now when we typically see the vast
2 majority of cases filed in an MDL, and we will be able to get
3 our arms around the complexity of MDL 2924 in a way that no
4 other MDL would have been able to do.

5 The data collected in the census plus forms will give
6 us an early window into the following: The numbers of
7 claimants, the types of claims, including the specific types of
8 cancers involved, and the stage of cancer for each individual
9 Plaintiff.

10 We will receive data on preexisting conditions that
11 relate to the specific types of cancers, a breakdown of usage
12 by year that will allow us to pinpoint specific brand
13 Defendants' involvement, which in this case is important
14 because we have a drug that was manufactured by four Defendants
15 over 35 plus years. This will further allow us in each
16 individual claim to determine the possible overlap of brand
17 Defendants in each case.

18 We will have a clear picture of all the retailer
19 Defendants that are involved and the number of potential claims
20 against each retailer Defendant, as Ms. Johnston mentioned
21 earlier. We will be able to pinpoint which of the generic
22 manufacturers are involved and the number of claims against
23 each of them.

24 We will have access to information related to the
25 method of ingestion, the dosage, whether prescription or over

1 the counter, and we will be able to determine percentages of
2 cases by state so that we may gain insight into the various
3 specific claims governed by the state law that relate to each
4 Defendant.

5 Because of the tolling agreement that was agreed to,
6 we will be able to do this without having to rush to file tens
7 of thousands of claims.

8 Because of the early census plus form we will be able
9 to do this without the need to complete what are often times
10 onerous and overwhelming fact sheets that ultimately lead to
11 deficiencies that can take years to resolve and needlessly bog
12 down both the Defense and Plaintiffs' law firms.

13 Because of the data we are able to dissect, both sides
14 will be able to make their own meaningful decisions about the
15 progression and direction of the litigation, and your Honors
16 will have access to data that may provide critical information
17 that could be used to form opinions on a multitude of matters.

18 On the Plaintiffs' side, this will certainly provide
19 guidance at the proper time and will be an effective tool for
20 early vetting and narrowing the scope of claims that will be
21 forwarded.

22 Because of the record sharing and ordering process,
23 Plaintiffs and Defense will share in costs for selected records
24 that will allow for a more complete picture for proof of use
25 and proof of injury on all claims, that may allow in this case

1 to determine the specific Defendants that should be involved
2 and clarify the exact injuries in each case, items that are
3 equally important to both sides.

4 Because of PTO 18, those who are filing a claim on
5 behalf of a decedent or an incapacitated party will easily be
6 able to obtain records as part of this census, as they are
7 designated as limited purpose representatives where otherwise
8 it would be extremely difficult and in many times too
9 burdensome for some to jump through the various hoops necessary
10 to obtain the records by more traditional means which could
11 include the burden of creating an estate.

12 Because of this process, both sides will be able to
13 easily and without too much delay begin to select cases to
14 become part of a bellwether sample pool. The data will allow
15 us to place cases in multiple buckets and truly give us a
16 representative sample of cases for various cancers, against
17 various Defendants, with ranges in years of ingestion, covering
18 multiple theories of liability, and with various preexisting
19 conditions so that we cover the entire court and what will
20 certainly not be a straight set victory by either side.

21 Only at this point will those chosen to be a part of
22 the smaller sample pool then be obligated to fill out full fact
23 sheets that will then allow for a strategic bellwether
24 selection if and when the time arises.

25 Because of the census registry in this case,

1 immediately following Daubert, we will be in a position to
2 quickly select bellwether cases, within days or weeks instead
3 of months.

4 Because of all of this, each singular Defendant will
5 have a clear picture as to the number of potential claims they
6 may face and its overall potential liability risk.

7 Because this is a voluntary process, your Honor has
8 allowed for Plaintiffs' attorneys to have the flexibility to
9 determine for each individual person whether entering the
10 registry is the right thing to do for that particular person.

11 As this registry is open to those Plaintiffs whose
12 claims lack diversity jurisdiction, it is inviting to virtually
13 all Plaintiffs regardless of where the suit may eventually have
14 to be filed.

15 I even believe this process is allowing us to reach
16 agreement on matters of discovery and scheduling that we may
17 not otherwise have been able to agree upon.

18 Once defense leadership is in place, we would ask this
19 Court to select attorneys for the Defense and for the
20 Plaintiffs in conjunction with the guidance from Special Master
21 Dodge who can continue to have bi-weekly or monthly discussions
22 to determine if there are any problems with data collection or
23 reporting, to discuss issues related to sample pools, and to
24 discuss other relevant issues as they relate to data analytics
25 we receive from the registry process and the CPFs that could

1 assist in any way in bringing this case to a fair and equitable
2 resolution. The frequency of these meetings may change
3 depending upon the stage and phase we are in in discovery.

4 There are other nuances of this census registry that
5 every attorney needs to understand and study, but I have
6 outlined what we consider to be the overall benefits.

7 I would be remiss if I did not close by stating that
8 the only reason that we as attorneys are here, for both sides,
9 and one of the main reasons it is imperative that we utilize
10 this incredible process at your direction is because of our
11 respective clients. It presents the greatest opportunity for
12 this litigation to proceed with clarity, with transparency, and
13 with efficiency. As it relates to our clients, we represent
14 real people with serious, and for many, life-threatening
15 injuries, and this affords them the greatest opportunity to
16 obtain justice in a timely and efficient manner.

17 Finally, as I stated earlier, I believe this could be
18 something that is a blueprint for future MDLs. However, as
19 with anything we do, we can make things better the second time
20 around. I have no doubt that along the way we will come up
21 with an ah-ha moment where we say next time maybe we can add
22 this. My hope is that future MDLs will be able to call upon
23 all of us to continue to assist in this process and provide
24 guidance so that they make not only use of what we created
25 here, but further enhance the process for those that follow.

1 I need to also make a plug here one last time for the
2 Plaintiffs Bar just to state that we are going to be conducting
3 a Webinar this coming Monday for all Plaintiffs and all
4 Plaintiffs' counsel to go over the entire CPF process, the
5 registry, so that we have a seamless and very meaningful
6 process in submitting the data for the CPF.

7 With that, your Honor, I will pass this for questions
8 or to Ms. Cohan.

9 *THE COURT:* Thank you, Mr. Pulaski. I look forward to
10 hearing from Ms. Cohan.

11 *MS. COHAN:* Good morning, your Honors, Lindsey Cohan
12 from Dechert, I represent GSK in this litigation, however, I am
13 presenting on behalf of all Defendants. It's morning or
14 afternoon, depending on where you happen to be.

15 As Mr. Pulaski said, I also want to extend my great
16 thanks to the Court, Special Master Dodge, your clerks, your
17 support staff, basically everyone who keeps the trains running
18 on time, and those that have really put so much attention and
19 thought into the census process.

20 In addition to the Court and Special Master Dodge,
21 that includes the parties who have really worked tirelessly to
22 make this as seamless as possible and to make it as effective
23 as possible.

24 Both of your Honors have touched on a need for
25 efficiency in this litigation, and we really do think that this

1 innovative novel process has made great strides in creating
2 that efficiency, and as Mr. Pulaski said, we think this will be
3 a model for MDLs to come and we thank you for involving us in
4 that process.

5 Though Defendants have not yet had an opportunity to
6 really dive into the initial census data, at even a very high
7 level it is clear that there are tremendous benefits to the
8 process, many of which Mr. Pulaski identified, but from a
9 Defense perspective, we also wanted to make sure that the Court
10 understood.

11 Of course it provides information about the nature and
12 volume of the claims that typically we would have to wait until
13 much further on in the litigation to get in the form of
14 Plaintiff fact sheets or otherwise. At an initial level, this
15 will allow us to do some early vetting of Plaintiffs and their
16 claims.

17 For example, if there is a lack of proof of use, proof
18 of injury, that's good to know, we can remove those claims out
19 and move on with the bellwether selection process. That is
20 going to be critical moving forward with the litigation and
21 making sure it is as streamlined as possible.

22 Beyond that, the process really fundamentally shapes
23 this litigation by framing what issues are in and are out of
24 this litigation. In many ways they have informed the scope of
25 discovery and aided in the discussions regarding what discovery

1 would be at issue here.

2 For example, yesterday you heard in many of the
3 presentations about the importance of the issue of general
4 causation here. One of the major pieces of information that
5 the initial census provided was the breadth of cancers that are
6 going to be alleged in this litigation, and that is going to be
7 crucial to us to understand as we move forward. There is other
8 data that is contained in those initial census -- excuse me,
9 the initial census forms that are beneficial. Dosage, duration
10 of use, all of those things are helpful for us to know as we
11 move forward.

12 The census plus data will continue to build on the
13 benefits that we saw from the initial census process. We will
14 get more detailed information, as Mr. Pulaski explained, and in
15 addition, that information will actually be verified by the
16 Plaintiffs. As the Court knows, the initial census forms were
17 submitted by the attorneys based on intake forms and other
18 things that they had easier access to. So, it will be helpful
19 to have that verified information.

20 In addition, also as Mr. Pulaski alluded to, the
21 census plus process will allow for collecting information and
22 medical records in a manner where which costs are actually
23 shared, which again is beneficial to all parties.

24 On the whole, we really do just believe that this
25 census process, the efficiencies of it has created -- will help

1 maintain this MDL as the focus and the driver of this
2 litigation nationwide.

3 With that, I turn it back to you, your Honor, and if
4 you have any questions, I am happy to address them.

5 *THE COURT:* I don't have any questions, and I thank
6 you both for your report on the content for those who have not
7 been as familiar with the initial census process because our
8 audience, as we know, is larger than maybe those who have
9 already participated in the census process, as Mr. Pulaski
10 said, those who have filed claims and those who applied for
11 leadership, but there may be others listening, I know with your
12 Webinar coming up, and others who have not yet filed. So, I
13 think it is nice that you have been able to give a broad
14 overview.

15 I, of course, intimately understand the process. You
16 are correct that it has been an issue in my experience that
17 precedes this litigation that has been spoken about, and while
18 there are not -- not every issue that Plaintiffs and Defense
19 agree on in MDLs, and we know there are some strong feelings
20 about some of those issues, my observation has been that this
21 is the one issue, this sort of notion of how best to early vet
22 cases for different reasons from both sides, but that serve
23 both sides, and I want to join in the chorus of accolades to
24 our Special Master Dodge who is tireless in her support and
25 creativity in this process of initial census.

1 She has spoken about it to judges and practitioners at
2 conferences, the judges on the MDL subcommittee, of which I
3 said have spoken about it, so it is really heartwarming to see
4 that it really works in practice as it has been envisioned to
5 serve the purposes, and I think it will only become even more
6 helpful and beneficial as the parties get to understand the
7 data, you know, more particularly and use the data.

8 I do think it will make for a more streamlined
9 litigation. If there is one theme throughout the past couple
10 of days from all of our perspectives, all of the stakeholders,
11 if you will, efficiency, and streamline, and clarity, and focus
12 leads to better lawyering, which means you are representing
13 your clients better, and I can assure you it leads to better
14 judging when I understand the issues, who the people are in
15 front of me, and what the claims are. So, I'm just really,
16 really delighted and again I want to thank Special Master Dodge
17 for spearheading this.

18 It was kind of easy for me, quite frankly, to endorse
19 it because I believe in it, and I feel I am kind of the lucky
20 beneficiary of it, and I hope you all feel the same way. And
21 to Mr. Pulaski's point, yes, we can all learn and improve.
22 Judges have done this before me, and I am hopeful and confident
23 judges will do this following me, and we are all doing the best
24 we can, but we are going to learn, and that's the great thing
25 about our profession generally, that we learn from what we do.

1 We try to improve, and we share our acknowledge with others so
2 that they can take that model and utilize it effectively in
3 other MDLs. So, thank you.

4 I don't have any further comments on the initial
5 census. Let me just turn to Judge Reinhart. He doesn't have
6 any comments on it or questions, so thank you for that
7 presentation.

8 I know that we did have a little bit of time allotted
9 for miscellaneous issues. There were none in particular from
10 my standpoint. I am just looking over my notes, but I think I
11 have said everything I wanted to say.

12 I want to just reiterate that we as a team, Judge
13 Reinhart and I, and Judge Reinhart at the lead will rule on
14 discovery motions quickly, with the protocol that Judge
15 Reinhart has in place that counsel seem to embrace and endorse,
16 although tweaking, and that is fine, to adapt to this case, but
17 at the bottom, the bottom line is that the process was designed
18 to ensure that you could be heard on those matters on which you
19 don't agree, and that you could be heard fully and you could be
20 heard quickly.

21 I think we often times know, as a former practitioner
22 and just from a judicial perspective, if you get bogged down on
23 discovery disputes, it really can hold up so many other things,
24 it is like a domino effect. So we appreciate that, we
25 appreciate that every issue may impact the next issue and the

1 next issue. We are just very mindful of that. We take pride,
2 if for nothing else, but I think we take pride on other things
3 as well, but really case management.

4 I enjoy it, and Judge Reinhart enjoys it. It is not
5 for everyone. Some judges just love the legal issues and they
6 maybe want to have someone else do the management part of it,
7 and just dive right in on the legal issues. I personally love
8 case management, and I loved it in State Court, and that was
9 unwieldy in State Court, quite frankly. I feel it is a luxury
10 actually to be in Federal Court with fewer cases and more
11 resources. I have a wonderful team, a devoted court reporter.
12 I will just share a personal story if I may.

13 My court reporter, Pauline Stipes, was the court
14 reporter for Judge Paine and I clerked for Judge Paine, so
15 right out of law school I clerked for Judge Paine, and Pauline
16 Stipes was the Court Reporter, and I am now sitting in the same
17 courtroom that Judge Paine held for all those years where I was
18 a law clerk, and Pauline is court reporting with me. I am so
19 privileged and honored to have her. There is no one better
20 than Pauline. So, when you hear me stop you, it is not to be
21 rude in any way, it is just she is a perfectionist. It is for
22 your benefit. She always says that it is for you, it is your
23 record.

24 Melanie Richardson, my courtroom deputy, is just
25 amazing, she does everything. She is IT support when IT

1 support is not here, although IT support has been terrific.
2 She just troubleshoots everything. She is warm, she is
3 friendly. So, you will always be welcomed in these chambers
4 and this courthouse in a warm and friendly way. Even when
5 things get tough and it gets more contentious than it is now,
6 hopefully we will always treat you well.

7 You should never feel badly about reaching out if
8 there are questions in the appropriate way as my orders and
9 rules provide for. Even on days when people may not be feeling
10 good, if you didn't get enough sleep or something like that, I
11 just don't think you will see crankiness on our part or
12 fatigue. We work hard, and that goes for the law clerks as
13 well. And so, you know, we are really looking forward to
14 really partnering with you in this massive case that we are
15 just at the tip of the iceberg, not to borrow one of the
16 screens that was shown yesterday, but, you know, in many ways
17 we are just beginning.

18 These were sort of critical two days, our status
19 conference yesterday and our discovery conference today, but in
20 many ways this has been underway since February 6th, when the
21 case was transferred, and so much work has been done. We have
22 a strong foundation on which we can build and make this
23 litigation one that you enjoy being a part of, that you feel
24 good about what you are doing, that you feel good about your
25 presence before the Court, that you feel good about how the

1 Court is acting and ruling and treating you, regardless of
2 whether the rulings go your way or not, and that you all feel
3 that you have been heard and that you are being treated fairly,
4 that the Court is neutral and impartial, and all of those
5 things that you want in a judge and in the judicial system as a
6 whole.

7 Those are my parting words. I may not see you again
8 until July if we are adhering to what was projected yesterday,
9 but I am putting it in your hands. I trust you, I trust you.
10 You have built a reputation with me in which I have confidence
11 in you, I have trust in you, and I am not going to mettle where
12 I don't need to, but I am here and available to, as I said,
13 guide, assist, and rule when it is time to rule.

14 And I know I speak for Judge Reinhart and maybe I will
15 turn it over to Judge Reinhart for any final parting words that
16 he would like to say.

17 *MAGISTRATE JUDGE REINHART:* I have nothing to add,
18 Judge, I think you summarized my feelings exactly. It is a
19 pleasure to work with you and be part of the team with you and
20 your staff, and we will do everything you just said. We will
21 wait to be called on. When we are called on, we will act
22 quickly and provide the services that the parties need to move
23 this case forward.

24 So, thank you.

25 *THE COURT:* Okay. With that, I wish everyone well.

1 Stay healthy, be well, and we look forward to convening again
2 in the future. That concludes our proceeding.

3 *(Thereupon, the hearing was concluded.)*

4 * * *

5 I certify that the foregoing is a correct transcript
6 from the record of proceedings in the above matter.

7
8 Date: May 26, 2020

9 /s/ Pauline A. Stipes, Official Federal Reporter

10 Signature of Court Reporter
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Pauline A. Stipes, Official Federal Reporter

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